

Personal Data Protection Act 2012

Personal Data Protection Policy



Straco Leisure Pte Ltd

Preamble

To our esteemed customers, business partners, employees and service providers

Ladies and gentlemen,

The rise of electronic commerce as a business model and the fast pace of globalisation of our market space have highlighted an increasingly important need to protect the personal data of our customers, business partners, employees and service providers.

Accordingly, we aim to offer our employees, customers and business partners worldwide a high level of protection of their personal data. Careful data handling is in line with the expectations of our customers, business partners and employees, and builds trust in the business and employment relations between the Company and its stakeholders.

This corporate policy sets out our corporate personal data protection policy (the “**Policy**”) for the handling of personal data of our employees, prospects, customers and business partners, and how we comply with the provisions of the Personal Data Protection Act 2012 (“**PDPA**”). It also sets out the procedures for employees, internal staff and contractors to follow when handling personal data. All employees and staff working within our organisation should familiarise themselves with the contents of this Policy and comply with its provisions.

This Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

As the Data Protection Officer of Straco Leisure Pte Ltd, I will be responsible for ensuring that the data protection guidelines and laws are implemented. My staff and I would be happy to assist you with any questions you may have concerning the protection of your personal data. Please contact us at +65 6854 5200 or email us at dpo@singaporeflyer.com.

Ringo Leong
General Manager
Straco Leisure Pte Ltd

Article 1: Personal Data Protection Policy

- 1.1 In this era of information technology, the value of personal data has become increasingly apparent. Virtually all transactions are processed electronically, and in the course of business, personal data is inevitably collected, used and disclosed. However, with a growing volume of personal data being processed and transferred, the protection of such information has correspondingly become more crucial.
- 1.2 Straco Leisure Pte Ltd (the “**Company**”) is committed to protecting the privacy and confidentiality of all personal data of its customers, business partners, employees and other individuals. The management and staff of the Company take our responsibilities under the PDPA seriously. The Company understands the importance of the personal data you have entrusted to us and believe it is our responsibility to properly manage, protect and process them. We recognise that a high standard of data security is needed to meet the expectations of our customers and the public, and to build and maintain trust in our relationships with our customers, business partners and employees.
- 1.3 In line with this, the Company has established this Policy, which sets out the framework for the Company’s management of personal data. This Policy establishes a robust and comprehensive system, which serves to protect personal data within the Company’s control from unauthorised access and illegitimate use. This Policy is strictly enforced across the Company, and reflects the Company’s dedication to maintaining the security and privacy of all personal data entrusted to the Company.
- 1.4 Please note that the provisions of this Policy, the provisions of the Company’s Privacy Policy (see <http://www.singaporeflyer.com/privacy-policy/>) and the provisions of other policies of the Company (insofar as they are stated to be applicable) shall apply to the Company’s dealings and

interaction with its employees, service-providers, contractors, consultants and customers ("**Third Parties**"). This Policy, the Company's Privacy Policy and other policies of the Company (insofar as they are stated to be applicable) are to be read together as one document.

- 1.5 The Policy supplements but does not supersede or replace any other consent which the Third Parties may have previously provided to the Company nor does it affect any rights that the Company may have at law in connection with the collection, use and/or disclosure of Third Parties' personal data. The Company may from time to time update this Policy to ensure that this Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. If any material revision is made to this Policy, updates will be published at the Announcement section of our website (www.singaporeflyer.com).
- 1.6 For the avoidance of doubt, this Policy forms a part of the terms and conditions governing the relationship between the Company and Third Parties and should be read in conjunction with such terms and conditions ("**Terms and Conditions**"). In the event of any conflict or inconsistency between the provisions of this Policy and the Terms and Conditions, the provisions of the Terms and Conditions shall prevail.
- 1.7 Without prejudice to the generality of the Policy, please refer to the Company's Privacy Policy (which can be found at <http://www.singaporeflyer.com/privacy-policy/>) for specific guidance on how the Company collects, maintains and protects personal data of the Company's customers particularly through the Company's website.
- 1.8 In Singapore, the management of personal data is governed by the PDPA. In keeping with this, the Company's collection, use, disclosure, and retention of personal data, as set out in this Policy, are in accordance with the PDPA. The application of the articles within this Policy is to be guided by the provisions and requirements of the PDPA, the Personal Data Protection Regulations and

the Advisory Guidelines as issued by the Personal Data Protection Commission from time to time.

Article 2: Objectives

2.1 The objectives of this Policy are as follows:

- (a) To establish a framework for the responsible collection, use and disclosure of personal data;
- (b) To ensure that all personal data and customer privacy is reasonably and adequately protected;
- (c) To facilitate customer and employee understanding of this Policy and processes, as well as provide channels for communication; and
- (d) To ensure compliance with all provisions of the PDPA.

Article 3: Scope

3.1 In the course of business, the Company may collect personal data from individuals, including:

- (a) Members of loyalty programmes and other customers;
- (b) Current, past, and prospective employees;
- (c) Suppliers and contractors;
- (d) Agents and consultants; and
- (e) Members of the public.

3.2 This Policy applies to the management of all personal data in the possession and/or under the control of the Company including (save where otherwise provided in other documents or contracts, HR/staff handbooks issued by the Company) personal data belonging to employees.

3.3 In this Policy, personal data refers to data from which an individual can be identified, and includes:

- (a) An individual's name, NRIC number, passport or other identification number, photograph, video images, telephone number, mailing address, finger prints and email address;
- (b) An individual's employment history, education background, and income levels;
- (c) references from schools, business partners and/or third parties; and
- (d) personal data pertaining to a third party (for example, spouse, children, parents, and/or siblings) provided by the individual

3.4 This Policy does not apply to business contact information, which refers to data which is provided to the Company by an individual for purposes that are not solely personal. However, where it is unclear if the data collected or intended to be used constitutes business contact information, the Company shall treat it as personal data to which this Policy shall apply.

Article 4: Consent

4.1 The Company shall not collect, use, or disclose any individual's personal data without obtaining the individual's consent.

- (a) The Company shall not require an individual to consent to the collection, use, or disclosure of any personal data beyond what is reasonably necessary.
- (b) The Company shall not obtain an individual's consent using false information or misleading practices.
- (c) The Company shall not obtain an individual's consent unless the individual has been notified of the purposes for which his or her personal data will be collected, used or disclosed.

4.2 The Company may also collect, use, or disclose personal data of an individual where the individual is deemed to have given consent. An individual is deemed to have given consent if:

- (a) the individual voluntarily provides the personal data to the Company for the purposes referred to in Article 4.1(c); and

(b) it is reasonable that the individual would voluntarily provide the data.

4.3 Notwithstanding Article 4.1 and pursuant to the provisions of the PDPA, the Company may collect, use and/or disclose personal data about an individual without obtaining the individual's consent. This includes instances where:

- (a) the collection, use, or disclosure of the personal data is clearly in the interest of the individual;
- (b) the collection, use, or disclosure of the personal data is necessary in the national interest, or for any investigations of proceedings;
- (c) the personal data is publicly available;
- (d) the personal data is necessary for evaluative purposes; and
- (e) the personal data is collected in the course of employment with the Company and is reasonably necessary for purposes of managing or terminating the individual's employment.

4.4 For documentation purposes, statements of consent shall generally be obtained either in written or electronic form.

- (a) In certain situations, consent may be given verbally, in which case the consent shall be properly documented by indicating the date and time the consent was given.
- (b) The statement of consent should indicate that the individual has been notified of the purpose for which the personal data will be collected, used, or disclosed.

Article 5: Collection of Personal Data

5.1 The Company shall collect an individual's personal data only for purposes which a reasonable person would consider appropriate, and where the individual has been informed of and has consented to the purpose(s).

5.2 The Company may collect personal data from customers, members of loyalty programmes, members of the public and employees in the following ways:

- (a) when an individual performs a transaction with the Company;

- (b) when an individual accesses the Company's website;
- (c) when an individual submits an application to the Company;
- (d) when an individual asks to be included in the Company's mailing list;
- (e) when an individual requests that the Company contact the individual;
- (f) when an individual responds to the Company's promotions or requests for information;
- (g) when the Company receives references from schools, business partners and/or any other organisations;
- (h) when the Company receives insurance related forms or documents from employees;
- (i) when an individual enters the premises and/or restricted areas of the Company; and
- (j) when an individual submits his or her personal data to the Company for any other reason.

5.3 Prior to obtaining consent for the collection of a person's personal data, the Company or its employees shall seek to inform the individual of the following information:

- (a) the identity of the person collecting the personal data;
- (b) the purpose for which the personal data is being collected, used or disclosed;
- (c) any other purpose the personal data may be used for;
- (d) upon request by that individual, the business contact information of the Data Protection Officer; and
- (e) third parties or categories of third parties to whom the personal data may be transferred to.

Article 6: Storage of Personal Data

- 6.1 The Company shall record all personal data in an accurate and complete manner.
- 6.2 The Company shall make reasonable efforts to ensure that all personal data is correct and up to date, particularly where:
- (a) the personal data is likely to be used by the Company to make a decision that affects the individual concerned; and
 - (b) the personal data is likely to be disclosed by the Company to another organisation.
- 6.3 All personal data collected by the Company shall be securely stored in an organised manner to prevent unauthorised access, use, modification, deletion or destruction.
- (a) Personal data shall be treated as confidential, and shall only be accessible to authorised employees who require such data for the fulfillment of their duties, and only to the extent necessary for the scope of the task in question.
 - (b) Paper files and other physical documents containing personal data shall be kept in a secure environment.
 - (c) Personal data stored in computers and computer systems shall be secured with passwords and such computers and computer systems shall be protected with appropriate computer security software and technology.
 - (d) Where personal data is protected by password, such passwords shall be secure, private, and regularly changed, and shall not be shared (save amongst authorised employees) or easily compromised.
 - (e) Personal data in the possession or under the control of the Company shall not be deleted, disposed or destroyed, whether physically or electronically, unless absolutely necessary and with the requisite authorisation.

- (f) The Company shall implement formalised responses to any breach of security, whether by employees or by third parties.

Article 7: Use of Personal Data

- 7.1 The Company shall use an individual's personal data only for purposes which a reasonable person would consider appropriate, and where the individual has been informed of and has consented to the purpose(s).
- 7.2 The Company may use an individual's personal data for the following purposes:
 - (a) the provision of goods and services;
 - (b) the provision of customer service;
 - (c) the conduct of employee management;
 - (d) the fulfillment of any legal or regulatory requirement; and
 - (e) any other legitimate business purpose.
- 7.3 Before accessing and using an individual's personal data, the Company shall check the following:
 - (a) whether the individual has consented to the purpose for which the personal data is to be used;
 - (b) whether the individual's consent has been withdrawn, or the individual has submitted a Withdrawal of Consent Form; and
 - (c) whether all or only part of the personal data needs to be used to achieve the intended purpose.
- 7.4 Where an individual has consented to having his or her personal data used for the contractual provision of goods and services:
 - (a) the personal data may be used for the purpose of fulfilling obligations under the contract, for example in the preparation of purchase orders, or to meet other customer requests;

- (b) the Company may use the contact information provided to contact the individual (such as by mail, e-mail, and telephone) for purposes of the contract; and
 - (c) the personal data may be used for the provision of advisory services, provided that such use is consistent with the purpose of the contract.

- 7.5 Where an individual has consented to having his or her personal data used for the provision of customer service:
 - (a) the personal data may be used for the purpose of responding to the individual's requests, including requests for information or access to personal information;
 - (b) the Company may use contact information provided to contact the individual (such as by mail, e-mail, and telephone) for customer service purposes; and
 - (c) the Company may use the personal data for follow up purposes after providing customer services, provided that such use is consistent with the scope of the customer service provided.

- 7.6 Where an individual has consented to having his or her personal data used for advertising purposes:
 - (a) the Company may use contact information provided to contact the individual (such as by mail, e-mail, and telephone) for advertising purposes; and
 - (b) employees of the Company must comply with the terms of Article 14.

- 7.7 Where an individual has consented to having his or her personal data used for the purpose of managing or terminating an employment relationship between the Company and that individual:
 - (a) where the individual is a job applicant, the Company may use contact information provided to contact the individual (such as by mail, e-mail, and telephone) to respond to his application; and

(b) the personal data may be used for other employee management purposes, such as for human resource related matters, or for security purposes.

7.8 Where the use of the personal data is otherwise permitted or required under the PDPA or any other written law:

(a) the Company shall first ascertain that the use of the personal data is in fact permitted or required, such as where the use is in either in the national or individual's interest, or where it is necessary for any investigations; and

(b) the Company shall only process the personal data to the extent permitted or required, and in compliance with the relevant statutes or regulations.

7.9 The use and processing of personal data shall be conducted in an organised and secure manner.

(a) Personal data shall only be processed by authorised employees who have received adequate training on the proper management of personal data.

(b) Personal data shall be processed in accordance with formalised procedural guidelines for the management and handling of personal data.

(c) Personal data shall be kept private and confidential throughout processing.

Article 8: Transmission of Personal Data

8.1 In the course of business, it may be necessary for the Company to disclose or transmit personal data, both within the organisation and to third parties.

8.2 The Company shall disclose an individual's personal data only for purposes which a reasonable person would consider appropriate, and where the individual has been informed of and has consented to the purpose.

8.3 Before transmitting an individual's personal data, the Company shall check:

- (a) whether the individual has consented to the purpose for which the personal data is to be transmitted;
 - (b) whether all or only part of the personal data needs to be transferred for the intended purpose; and
 - (c) whether the transmission of such data is in conflict with any interest of the individual that merits protection.
- 8.4 If the personal data is to be transmitted to a recipient outside of Singapore, the Company shall:
- (a) obtain sufficient contractual guarantee or otherwise ensure that recipient of the transferred personal data is legally bound to provide to the data a level of protection commensurate with this Policy; and
 - (b) manage and handle any transferred personal data still in the possession or under the control of the Company in accordance with the provisions of this Policy.
- 8.5 The security of personal data that is transmitted to a third party service provider for the purposes of processing shall nonetheless remain the responsibility of the Company. When selecting a third party service provider, the Company shall thus ensure that:
- (a) the service provider meets the necessary technical and organisational security requirements to adequately protect the personal data;
 - (b) the service provider processes the personal data in accordance with the Company's instructions; and
 - (c) the service provider's obligation to meet the data protection and information security requirements in Article 8.5(a) be included in its contract with the Company.
- 8.6 Where personal data is transmitted to the Company by a third party which processed the data on behalf of and for the purposes of the Company pursuant to a contract, the Company shall ensure that:
- (a) the data has been collected lawfully in accordance with the relevant legal provisions under the PDPA; and

(b) the individual has consented to the transmission and use of his or her personal data for the intended purpose.

8.7 Where personal data is processed by the Company on behalf of and for the purposes of a third party pursuant to a contract, the Company shall ensure that:

(a) the data shall be deleted, disposed or destroyed upon expiration of the retention periods provided in Article 9.2; and

(b) the data is protected in accordance with the provisions of Article 12.

8.8 All transmission of personal data shall be conducted in an organised and secure manner.

(a) Personal data shall only be transmitted by authorised employees who have received adequate training on the proper ways to transmit personal data.

(b) Personal data shall be transmitted in accordance with formalised procedural guidelines for the transmission and disclosure of personal data.

(c) Personal data shall be kept private and confidential throughout transmission.

Article 9: Retention

9.1 The Company shall not keep personal data indefinitely. The Company shall cease to retain personal data as soon as it is reasonable to assume that:

(a) the purpose for which the personal data was collected is no longer being served; or

(b) retention is no longer necessary for business or legal purposes.

9.2 The usual retention periods for various groups of personal data are as follows:

(a) personal data of customers and members of loyalty programmes will generally be retained for a period of seven (7) years.;

- (b) personal data of employees will generally be retained for a period of seven (7) years;
- (c) personal data of unsuccessful job applicants will generally be retained for one (1) month from the date of application or interview, whichever is later; and
- (d) personal data of other individuals (including suppliers and contractors of the Company) will generally be retained for a period of [seven (7)] years.

9.3 The Company may retain personal data for a longer duration than the retention periods set out in Article 9.2 where it is reasonable or necessary for the Company to do so.

9.4 The Company ceases to retain any personal data when such personal data is deleted, disposed or destroyed in a complete and permanent manner, or otherwise properly anonymised such that the personal data is no longer associated with any particular individuals.

9.5 Deletion, disposal, destruction or anonymisation of personal data shall be conducted in an organised and secure manner.

- (a) Personal data shall only be deleted, disposed or anonymised by authorised employees who have received adequate training on the proper methods to delete, destroy and/or anonymise personal data.
- (b) Personal data shall be deleted, destroyed or anonymised in accordance with formalised procedural guidelines for the disposal of personal data.
- (c) Personal data shall be kept private and confidential throughout deletion or anonymisation.

Article 10: Personal Data Requests

10.1 An individual can request to be provided with all personal data about him or her that is in the possession or under the control of the Company, as well as information about how that data has been used or disclosed.

- (a) Individuals may submit an **Access Request Form** to the Data Protection Officer via email to dpo@singaporeflyer.com or via fax to +65 6339 9167.
- (b) The Company shall endeavour to attend to all requests within 30 days. If the Company is unable to attend to the request within 30 days of receipt, the Company shall within that time inform the applicant in writing of the time by which it will respond to the request.
- (c) Notwithstanding Article 10.1(b), the Company shall not grant the individual's request if the Company is not required to provide such data or information under the PDPA or any other written law, for example where the request is frivolous or vexatious or where the burden and/or expense of providing access may cause unreasonable interference with the Company's operations.
- (d) The Company may charge a fee of not more than S\$50 for the cost and time of attending to the access request provided that the individual making the request has been clearly informed of the fee.

10.2 An individual may request the Company to correct an error or omission in his or her personal data that is in the Company's possession or under the Company's control.

- (a) Individuals may submit a **Correction Request Form** to the Data Protection Officer via email to dpo@singaporeflyer.com or via fax to +65 6339 9167.
- (b) The Company shall correct the personal data as soon as practicable, and shall, where necessary, send the corrected personal data to any organisation the data was disclosed to within a year before the request.
- (c) Notwithstanding Article 10.2(b), a correction shall not be made if the Company is not required to make such correction under the PDPA or any other written law, or where there are reasonable grounds why the correction should not be made.

10.3 An individual may withdraw consent to the collection, use, or disclosure of his or her personal data upon the provision of reasonable notice to the Company.

- (a) Individuals may submit the **Withdrawal of Consent Form** to the Data

Protection Officer via email to dpo@singaporeflyer.com or via fax to +65 6339 9167.

- (b) The Company shall notify the individual of the consequences of withdrawal of consent, and shall cease to collect, use and/or disclose the individual's personal data within seven (7) days of processing the Withdrawal of Consent Form.

Article 11: Complaints & Queries

11.1 An individual may submit a complaint or query to the Company regarding the application of this Policy and the PDPA, or any other issue related to the Company's management of personal data.

- (a) Individuals may object to their personal data being used for certain purposes, or may request that their personal data be deleted, disposed or destroyed.
- (b) Individuals may submit a **Complaints & Queries Form** to the Data Protection Officer via email to dpo@singaporeflyer.com or via fax to +65 6339 9167.
- (c) The Company shall endeavour to attend to all complaints and queries within 30 days, failing which, within a period which is reasonable under the circumstances.

11.2 The Company shall treat all complaints and queries seriously, and shall respond in an appropriate manner.

- (a) All complaints and queries should be directed to the Data Protection Officer.
- (b) The Company's legal obligations under the PDPA and any other written law must be taken into account before any response to a complaint or query is given.
- (c) When communicating directly with an individual expressing a complaint or query, employees shall respond in a polite and helpful manner.

- (d) When responding to a complaint or query, employees shall provide the individual with a copy of this Policy, as well as the **Complaints & Queries Form**.
- (e) All complaints and queries, as well as the responses given to the individual, shall be recorded and reported to the Data Protection Officer.
- (f) The Data Protection Officer shall periodically review the complaints and queries submitted to the Company and take appropriate action to remedy any outstanding issues regarding the Company's management of personal data.

Article 12: Compliance

12.1 The Company shall protect all personal data in its possession or under its control by making appropriate technical and organisational security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, deletion, anonymisation and/or disposal.

12.2 The Company shall ensure that:

- (a) an adequate electronic security system is in place to protect all personal data in its possession or under its control, and that such system is periodically updated;
- (b) appropriate administrative and physical measures are adopted to protect the personal data in its possession or under its control;
- (c) a proper organisational plan is in place specifying the employees who are required to deal with personal data in the course of their duties and are thus authorised to access personal data;
- (d) formalised procedural guidelines for the collection, use and disclosure of personal data are in place;
- (e) all employees managing and handling personal data are appropriately trained;
- (f) regular reviews and audits of the manner in which personal data is being handled and managed are carried out;

- (g) this Policy and the procedural guidelines herein are regularly revised to take into account any technological developments, organisational changes, and changes in the law; and
- (h) this Policy and the procedural guidelines herein are strictly enforced.

12.3 All employees shall receive adequate and regular training on data protection.

In keeping with this, all employees shall:

- (a) be provided with this Policy upon joining the Company;
- (b) be regularly updated on any changes to this Policy;
- (c) be made aware of the requirements under the PDPA;
- (d) be instructed on the formalised procedural guidelines for the collection, use, and disclosure of personal data;
- (e) be briefed on the importance of maintaining the privacy and confidentiality of personal data
- (f) be instructed on their role in maintaining the security of all personal data in the possession or under the control of the Company;
- (g) be made aware that any unauthorised access of personal data, disclosure of personal data to unauthorised persons, and unauthorised use or collection of personal data is strictly prohibited;
- (h) have adequate recourse, whether to their superiors or to the Data Protection Officer, for any queries on personal data; and
- (i) be trained in handling queries from the public on personal data.

12.4 Pursuant to Article 12.3, all employees shall be trained, and henceforth be required, to:

- (a) fully observe all requirements under this Policy for the collection, use and disclosure of personal data;
- (b) ensure the accuracy of personal data used;
- (c) ascertain and review the length of time the Company should hold the personal data of an individual;
- (d) ensure that each individual whose personal data is being held by the Company can fully exercise the rights he or she is entitled to under the Policy and the PDPA.

Article 13: Data Protection Officer

13.1 The Company has appointed a Data Protection Officer to ensure that the Company complies with this Policy and all other requirements under the PDPA.

- (a) The Data Protection Officer may appoint data protection coordinators within the various departments and business groups of the Company and delegate to such coordinators such of his responsibilities as he deems fit.
- (b) In recognition that the appointment of the Data Protection Officer does not relieve the Company of any of its obligations under the PDPA, the Company shall assist the Data Protection Officer in carrying out his duties.

13.2 The Data Protection Officer shall:

- (a) be responsible for the general administration of the privacy and security of all personal data within the Company's possession;
- (b) be responsible for the enforcement and implementation of this Policy;
- (c) ensure that employees obtain the necessary training on handling personal data and the various data protection measures;
- (d) to the best of his ability, ensure that the Company complies with this Policy and with the PDPA;
- (e) carry out regular data protection checks and audits;
- (f) be immediately informed of and respond to any breach of this Policy;
- (g) advise any employee on any data protection issue; and
- (h) respond to any public queries, complaints, and requests for information regarding this Policy or any other data protection issue.

13.3 Contact details for the Data Protection Officer are as follows:

- (a) Name: Mr Ringo Leung
- (b) Position: Data Protection Officer
- (c) Telephone number: +65 6854 5200
- (d) Fax number: +65 6339 9167
- (e) Email address: dpo@singaporeflyer.com

Article 14: Do Not Call Provisions

- 14.1 The Company shall not send any marketing messages or make any marketing calls to Singapore telephone numbers unless it has checked and confirmed that the numbers are not listed on the Do Not Call Registry (<https://www.dnc.gov.sg/index.html>), unless the individual has given clear and unambiguous consent to receive such messages or calls.
- 14.2 The Company shall not send any marketing messages or make any marketing calls to Singapore telephone numbers without providing clear and accurate information of the following:
- (a) the identification of the sender or the Company; and
 - (b) the contact information of the sender or the Company, such information to be valid for at least 30 days after each message is sent.
- 14.3 The Company shall not conceal or withhold the identity of the caller when it makes voice calls to any Singapore telephone number.
- 14.4 An individual who does not wish to receive such marketing messages or calls may at any time withdraw his or her consent upon the provision of reasonable notice to the Company.