

DATA PROTECTION POLICY

This Data Protection Policy (the "**Privacy Policy**") sets out the basis which Soda Plus Pte. Ltd. ("we", "us", "our", or the "**Company**") may collect, use, disclose or otherwise process personal data of our customers in accordance with Singapore's Personal Data Protection Act 2012 (the "**PDPA**"). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

We at Soda Plus Pte. Ltd. ("**Soda+**") take our responsibilities under the PDPA seriously. We also recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

1. PERSONAL DATA

1.1. As used in this Privacy Policy:

"customer" means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

"personal data" means data, whether true or not, about a customer 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. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.

1.2. We will collect your personal data in accordance with the PDPA. We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent.

1.3. Some examples of Personal Data that we may collect: Depending on the nature of your interaction with us, and for the purpose of carrying on the Company's business, including registration and administration of the Company's related products and services (including relevant online services), you may be requested to provide personal data such as, but not limited to, the following, without which it may not be possible to satisfy your request:

1.3.1. your name and identification information, such as your NRIC number;

1.3.2. correspondence address, and/or billing address;

- 1.3.3. contact information such as your address, email address, mobile number or telephone number, nationality, gender, date of birth, photographs; and
 - 1.3.4. payment details, including credit card and banking information.
- 1.4. In some instances, you may also be requested to provide certain data that may be used to further improve our products and services and/or better tailor the type of information presented to you. In most cases, this type of data is optional although, where the requested service is a personalised service, or provision of a product or dependent on your providing all requested data, failure to provide the requested data may prevent us from providing the service to you. This type of data includes, but is not limited to:
- 1.4.1. your age;
 - 1.4.2. gender;
 - 1.4.3. salary range and employment details;
 - 1.4.4. education level and profession;
 - 1.4.5. health condition, hobbies and leisure activities;
 - 1.4.6. other related products and services subscribed to; and
 - 1.4.7. family and household demographics.

2. COLLECTION, USE, AND DISCLOSURE OF PERSONAL DATA

- 2.1. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly, or via a third party who has been duly authorised by you to disclose your personal data to us (your "authorised representative") after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
- 2.2. We may collect, use, disclose and/or process your personal data for one or more of the following purposes:
- 2.2.1. performing obligations in the course of or in connection with our provision of the goods and/or services requested by you, including to require you to fill in

relevant forms which will help us to better understand your needs and requirements with respect to our services;

- 2.2.2. verifying your identity;
- 2.2.3. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- 2.2.4. managing your relationship with us;
- 2.2.5. processing payment or credit transactions;
- 2.2.6. any other purposes for which you have provided the information;
- 2.2.7. carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- 2.2.8. contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your relationship with us such as but not limited to communicating information to you related to:
 - 2.2.8.1. the status of your project; and
 - 2.2.8.2. any payment statuses, whether outstanding or not.
- 2.2.9. carrying out due diligence or other screening in accordance with any legal or regulatory obligations or our risk management procedures that may be required by law or that may have been put in place by us;
- 2.2.10. to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether relating to your relationship with us or any other matter arising from your relationship with us, and whether or not there is any suspicion of the aforementioned;
- 2.2.11. complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, including meeting the requirements to make disclosure under the requirements of any law binding on us and/or for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which we are expected to comply;
- 2.2.12. complying with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities. For the avoidance of

doubt, this means that we may/will disclosure your personal data to the aforementioned parties upon their request or direction;

- 2.2.13. conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our services in order to enhance your relationship with us or for your benefit, or to improve any of our products or services for your benefit;
- 2.2.14. storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
- 2.2.15. providing and sending you marketing, advertising, initiatives, and promotional information, materials and/or documents relating to our goods or services which we think may be of benefit or interest to you, via (i) postal mail to your postal address(es) and/or electronic transmission to your email address(es), and (ii) if so consented by you, via telephone calls, SMS/MMS and/or facsimile to your telephone number(s); and
- 2.2.16. any other incidental business purposes related to or in connection with the above.

(collectively, the “**Purposes**”)

- 2.3. As the Purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.
- 2.4. In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether sited in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes. Examples of service providers include companies that provide web hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing, debt recovery and other services.
- 2.5. The Purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

3. CONSENT

- 3.1. By submitting personal data to us, you undertake and warrant that:
 - 3.1.1. you have the authority to provide that personal data to Soda+;
 - 3.1.2. the personal data provided is accurate and true;
 - 3.1.3. you have informed the individual about the purposes for which his/her personal data is collected, used and disclosed as well as the parties to whom such personal data may be disclosed or transferred by Soda+, as set out; and
 - 3.1.4. the individual has consented to the collection, use and disclosure of his/her personal data for such purposes.

4. THIRD PARTY DISCLOSURE

- 4.1. We respect the confidentiality of the personal data you have provided to us.
- 4.2. In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:
 - 4.2.1. cases in which the disclosure is required or authorised based on the applicable laws and/or regulations;
 - 4.2.2. cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
 - 4.2.3. cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
 - 4.2.4. cases in which the disclosure is necessary for any investigation or proceedings;
 - 4.2.5. cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
 - 4.2.6. cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or

- 4.2.7. where such disclosure without your consent is permitted by the PDPA or by law.
- 4.3. The instances listed above under paragraph 4.2 are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <https://sso.agc.gov.sg/>.
- 4.4. Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

5. COOKIES

- 5.1. Please note that we use cookies on our website. Cookies are text files that we put on your computer and they store/record information about your visit to and use of the website. Cookies can compile information about your browsing habits and can also enhance your browsing experience. This information may include, but is not limited to, relevant login and authentication details as well as information relating to your activities and preferences across our websites. We set out below more details about the cookies we use. You can of course disable cookies.
- 5.2. We use cookies for the following purposes:
 - 5.2.1. to improve your user experience on this website;
 - 5.2.2. to remember your preferences;
 - 5.2.3. to help us understand how this website is performing;
 - 5.2.4. to monitor traffic to the website; and
 - 5.2.5. to enable this website to function properly.
- 5.3. You can control cookies through your web browser settings. This allows you to determine which cookies to allow and which to refuse. If you disallow the use of cookies on our website, please note that you may not be able to access the full range of functions that our website offers.
- 5.4. Personal data (if any) that we collect from you through cookies may be passed to our third party service providers, whether located in Singapore or elsewhere, for one or more of the Purposes, for managing and/or administering our website, or for the purpose of data hosting/storage/backup.

- 5.5. Your use of our website constitutes consent by you to our use of cookies and to the matters set out herein.

6. DIRECT MARKETING

- 6.1. The Company will honour an individual's request not to use his/her personal data for the purposes of direct marketing. Any such request should clearly state details of the personal data in respect of which the request is being made. Please state clearly the authority under which you are authorised to make such a request. Unless otherwise instructed as per the above, the Company may use any of the data collected in the normal course of its business for the purposes as set out under paragraph 2.1 above.

7. LINKS TO OTHER WEBSITES

- 7.1. We may provide links to websites outside of the Soda+ website. These linked sites are not under the control of Soda+, and Soda+ is not responsible for the conduct of companies linked to the Soda+ website, nor for the performance or otherwise of any content and/or software contained in such external websites.

8. ACCURACY OF PERSONAL DATA

- 8.1. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete, and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.
- 8.2. Where possible, we will validate data provided using generally accepted practices and guidelines. This includes the use of check sum verification on some numeric fields such as account numbers or credit card numbers. In some instances, we are able to validate the data provided against pre-existing data held by the Company. In some cases, the Company is required to see original documentation before we may use the personal data such as with identity cards and/or proof of address(es).

9. RETENTION OF PERSONAL DATA

- 9.1. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
- 9.2. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

10. PROTECTION OF PERSONAL DATA

- 10.1. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption, and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
- 10.2. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

11. ACCESS TO AND CORRECTION OF PERSONAL DATA

- 11.1. You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to us. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. Hence, please submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 11.2. For a request to correct personal data, once we have sufficient information from you to deal with the request, we will:
- 11.2.1. correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request; and
 - 11.2.2. subject to paragraph 11.3, we will send the corrected personal data to every other organisation to which the personal data was disclosed by Soda+ within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.
- 11.3. Notwithstanding paragraph 11.2.2 above, we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.
- 11.4. We will also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of

the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

12. WITHDRAWING YOUR CONSENT

- 12.1. The consent that you provide for the collection, use, and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 12.2. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) business days of receiving it.
- 12.3. Whilst we respect your decision to withdraw your consent, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. Please also note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods and services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 12.1 above.
- 12.4. Please note that withdrawing consent does not affect our right to continue to collect, use, and disclose personal data where such collection, use, and disclose without consent is permitted or required under applicable laws.

13. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 13.1. We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by Soda+ to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.
- 13.2. We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security

arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, leakage, modification, loss, damage, and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control.

- 13.3. We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.
- 13.4. Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so, and will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

14. COMPLAINT PROCESS

- 14.1. If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
- 14.2. Please contact us through one of the following methods with your complaint or grievance:
E-mail: thirsty@sodapluscreative.com and attention it to the 'Data Protection Officer'.
- 14.3. Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as "PDPA Complaint".
- 14.4. We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

15. UPDATES ON PRIVACY POLICY

- 15.1. As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 15.2. We reserve the right to amend the terms of this Privacy Policy at our absolute discretion. Any amended Privacy Policy will be posted on our website here.
- 15.3. You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

16. CHANGE OF PRIVACY POLICY

- 16.1. Soda+ reserves the right to alter any of the clauses contained herein in compliance with local legislation, to meet its global policy requirements, and for any other purpose deemed necessary by the Company.

This Privacy 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.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the "**DPO**") at:

Data Protection Officer
Soda Plus Pte. Ltd.
E-mail: thirsty@sodapluscreative.com

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