

## **Singapore Pools Personal Data Protection and Privacy Policy**

Singapore Pools places great importance on the confidentiality, privacy and protection of personal data. This policy sets out the way we handle personal data provided to us.

### **1. What We Collect**

- 1.1 We collect and use personal data necessary to conduct our business with you. The types of data we collect may include, but is not limited to:
  - a. Full name
  - b. Identity document number e.g. NRIC, FIN, passport number
  - c. Photographs or video images from which an individual can be clearly identified
  - d. Mobile or residential telephone number
  - e. Personal E-mail address
  - f. Residential address
  - g. Nationality
  - h. Date of Birth
  - i. Audio recording of customer service calls
- 1.2 Close-circuit television (CCTV) footage recording movement, where the individuals may be identified, are primarily for security purpose, investigations into customer complaints and other authorised purpose. Singapore Pools does not use CCTV footage for marketing purpose.

### **2. When We Collect**

- 2.1 When you open a Singapore Pools Account or when you update your personal particulars.
- 2.2 When you attend our corporate events or respond to our programmes, contests or survey.
- 2.3 When your image is captured by our photographers or videographers at our events.
- 2.4 When your image is captured on our CCTV system.
- 2.5 When you apply for a job with us.

- 2.6 When you provide feedback or contact customer service officers.
- 2.7 When you claim prize amounts above \$5,000 at our Main Branch (210 Middle Road) with a winning ticket.

### **3. Purposes for Collection, Use and Disclosure of Your Personal Data**

- 3.1 Singapore Pools collects data only for the specified purpose(s). Where the data is used for communicating product-related information, we operate on opt-in basis, and within the scope of consent.
- 3.2 To send you information, promotions, updates and marketing and advertising material. We do not make cold calls or use any third-party contact lists for communicating product-related information.
- 3.3 To respond to your requests and queries.
- 3.4 To enforce our rules and regulations, contractual and legal rights and obligations.
- 3.5 To ensure security for our premises.
- 3.6 To facilitate the employment of staff by Singapore Pools.
- 3.7 To comply with the law, any requests from law enforcement and regulatory officials, or orders of court.
- 3.8 To process payment transactions.
- 3.9 To manage and improve the products and services we provide to you.
- 3.10 To comply with our responsible gambling commitments.
- 3.11 To assist retail venues in their management activities.
- 3.12 Processing of the account opening application.
- 3.13 Administration of the account.
- 3.14 Conducting surveys, focus group discussions and to obtain feedback.

- 3.15 Towards any other purpose of use for which we have obtained your consent, express or implied.
- 3.16 We may disclose your personal data to third party service providers, agents and other organisations we have engaged to perform any of the aforementioned purposes for us.

#### **4. Protection of Your Personal Data**

- 4.1 All data is handled in accordance with Singapore Pools' Security Policy, which covers measures to prevent the unauthorized disclosure or loss of personal data.
- 4.2 All Singapore Pools staff are trained in the proper handling and protection of personal data.
- 4.3 All Singapore Pools vendors and suppliers are obligated to abide by our data privacy and protection policies.
- 4.4 Singapore Pools will not reveal details of your personal data to any other person unless we have your permission or is required under a legal obligation or any other duty to do so.
- 4.5 Access to your personal data is on a need-to-know basis.

#### **5. Accuracy of Your Personal Data**

- 5.1 Singapore Pools will correct any inaccurate data when notified by the authorised party.

#### **6. Retention of Your Personal Data**

- 6.1 Singapore Pools will retain such personal data in accordance with respective business needs and/or legal requirements.
- 6.2 Singapore Pools will securely dispose of or anonymise personal data which it can reasonably determine is no longer needed.

## **7. Withdrawal of Your Consent**

- 7.1 You can withdraw your consent previously given in regard to the processing of your personal data, through the “unsubscribe” or opt-out clause attached to our marketing communications. If you wish to make a blanket withdrawal of consent, you can do so by filling up a Blanket Withdrawal of Consent Form (refer to Annex A).
- 7.2 Upon receiving any withdrawal of consent, we shall acknowledge the withdrawal request and confirm that the marketing communication will stop within 5 working days.

## **8. Access and Correction of Your Personal Data**

- 8.1 You can obtain access and make corrections to your personal data records, via the following:
- a) Customer Service Line: 6786 6688
  - b) Written mail: Singapore Pools (Private) Limited, 210 Middle Road, #01-01 Singapore 188994
  - c) Online feedback form on Singapore Pools’ website (<http://www.singaporepools.com.sg/en/cu/Pages/default.aspx>)
- 8.2 We will make the necessary amendments and confirm that these have been made as soon as practicable upon our receipt of your request.
- 8.3 If you have any questions or feedback relating to your personal data or our Personal Data Protection and Privacy Policy, you can contact us via customer service line, written mail or online feedback form.

## **9. Transfer of Your Personal Data Out of Singapore**

- 9.1 Singapore Pools may transfer, store and/ or process your personal data by a party outside of Singapore.
- 9.2 We will ensure that the party receiving, storing and/ or processing your personal data outside of Singapore protects your personal data at a standard at least comparable to the protection under the Personal Data Protection Act (“PDPA”).

- 9.3 We will ensure that the party coming into contact with your personal data outside Singapore:
- a) Complies with the PDPA, all applicable laws and regulations; and
  - b) Takes appropriate measures to ensure such compliance by implementing the necessary data protection.

## **10. Collection, Use or Disclosure of Your NRIC Numbers (or Copies of NRIC) and Retention of Your Physical NRIC**

- 10.1 Singapore Pools is generally not allowed to collect, use or disclose NRIC numbers (or copies of NRIC). We may do so only in the following specified circumstances:
- a) We may collect, use or disclose your NRIC number (or copy of NRIC) without your consent if it is required under the law; and
  - b) Where we find it necessary to accurately establish or verify the identity of you to a high degree of fidelity, we may collect, use or disclose your NRIC number with notification and consent.
- 10.2 The treatment for NRIC numbers also applies to Birth Certificate numbers, Foreign Identification Numbers (“FIN”), Work Permit numbers and passport numbers.
- 10.3 Singapore Pools should generally not retain your physical NRIC unless the retention of the physical NRIC is required under the law. The treatment for retention of physical NRIC applies to other identification documents containing the NRIC numbers or other national identification numbers (e.g. driver’s licence, passport and work pass).

## **11. Complaints Handling Process**

- 11.1 If you are aware of any actual or potential breach of security in relation to personal data, you can report the incident/complaint to Singapore Pools Customer Service via customer service line, written mail or online feedback form. Customer Service will forward the incident/complaint to Data Protection Officer (“DPO”). DPO will assess the incident/complaint and carry out investigations if necessary.

## **12. Third-Party Sites**

- 12.1 Singapore Pools website may contain links to other websites operated by third parties independent of Singapore Pools. We are not responsible for the privacy practices of such websites operated by third parties even though they may be linked to our website(s).

## **13. Update**

- 13.1 Singapore Pools reserves the right to amend this Personal Data Protection and Privacy Policy at any time by posting such changes on our Corporate Websites.

(Updated as at 18 Feb 2022)

## Annex A

### Blanket Withdrawal of Consent Form

Name : \_\_\_\_\_

#### Contact details

E-mail : \_\_\_\_\_

Mobile number : \_\_\_\_\_

Postal address : \_\_\_\_\_

\_\_\_\_\_

I hereby revoke all and any consent previously given to Singapore Pools for product-related information. Singapore Pools may only contact me on transaction or other business-related matters.

\_\_\_\_\_

Signature

\_\_\_\_\_

Date