

Singapore Pools Personal Data Protection and Privacy Policy

Singapore Pools places great importance on the confidentiality, privacy and protection of personal data. This policy outlines the way we handle personal data which is subjected to the Personal Data Protection Act 2012 (“PDPA”).

1. What We Collect

- 1.1 We collect and use personal data necessary to conduct our business with you (such as bank account related information required for payment processing). Personal data that 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 We collect personal data based at various touchpoints deemed necessary as per below when we conduct business with you or for the purposes of employment with Singapore Pools but is not limited to the following.
- 2.2 When you open a Singapore Pools Account or when you update your personal particulars.
- 2.3 When you attend our corporate events or respond to our programmes, contests or survey.

- 2.4 When your image is captured by our photographers or videographers at our events.
- 2.5 When your image is captured on our CCTV system.
- 2.6 When you apply for a job with us.
- 2.7 When you provide feedback or contact customer service officers.
- 2.8 When you claim prize amounts above \$5,000 at our Main Branch (210 Middle Road) with a winning ticket.
- 2.9 When you receive fund transfers from Singapore Pools via electronic mode of payment (e.g. Paynow) for payment of prize monies at our outlets.

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

- 3.1 Singapore Pools collects data only for the specified purpose(s) that you have given your consent. Data that is used in communicating product-related information are operated on an 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 To conduct screening for vendors that bid for projects
- 3.16 Towards any other purpose of use for which we have obtained your consent, express or implied.
- 3.17 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 Singapore Pools has implemented security arrangements in accordance with Singapore Pools' Security Policy to safeguard personal data from unauthorized access, use, disclosure, disposal, copying, modification, or loss of data.
- 4.2 All Singapore Pools staff are trained in data protection and ways to handle personal data securely.
- 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 make reasonable efforts to ensure personal data collected is accurate and complete. Singapore Pools will update the personal data upon notified by you pertaining to any changes under reasonable ground.

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 If you wish to submit a withdrawal of consent to us, do note that we will no longer be able to provide any services to you that requires provision of personal data. This may result in termination and/or closure of your Singapore Pools Account and others of such services.
- 7.2 Your consent that was previously obtained from you for the collection, use and disclosure of personal data will remain valid unless we receive a withdrawal request from you.
- 7.3 You can withdraw your consent for the collection, use and disclosure of personal data through the “unsubscribe” or opt-out clause attached to our marketing communications. If you wish to withdraw all your consent that were previously given to us, you can do so by filling up a Withdrawal of Consent Form (refer to Annex A).
- 7.4 Upon receipt of request for withdrawal of consent, we shall process and acknowledge the withdrawal request. The marketing communication will cease within 5 working days.

8. Access and Correction of Your Personal Data

- 8.1 You can submit an access request or a correction request for your personal data records via the following methods:
- a) Customer Service Hotline: 6786 6688
 - b) Mailing Address: 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 Upon receive your request, we will proceed to ascertain your identity as well as understand the nature of the request through the information provided by you. We may request for more details from you regarding your request if the information provided are insufficient to deal with your request.
- 8.3 If the request is pertaining to correction of your personal data, we will make the necessary amendments and confirm that these have been made as soon as practicable upon our receipt of your request. If the request is pertaining to access to your own personal data, we will provide you as soon as practicable. Kindly note that there would not be any fee charges for such access or correction request to the personal data.
- 8.4 If you have any questions or feedback relating to your personal data or this policy, you can contact us via customer service hotline, mail to us or submit an 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 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 hotline, mail to us or submit an 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. Data Protection Officer

- 12.1 You may contact our Data Protection Officer if you have any queries or feedback regarding any personal data matters.

Data Protection Officer

Email: PDPA_Compliance@sgpoolz.com.sg

Mailing Address: Singapore Pools (Private) Limited, 210 Middle Road,
#01-01 Singapore 188994

13. Third-Party Sites

- 13.1 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).

14. Update

- 14.1 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 30 Aug 2024)

Annex A

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