

Privacy Policy

- LEGATE respects an individual's right to privacy and has based its privacy policy on the Personal Data Protection Act 2012 (PDPA).

- **What does this Policy Cover?**

This policy:

- sets out the principles LEGATE follows when collecting, using, disclosing, retaining, and removing personal data; and
- describes other important topics relating to an individual's privacy.

By purchasing goods from LEGATE, communicating with LEGATE through email, by telephone, in writing or by using any of LEGATE's other services, including the LEGATE website, or by providing personal data to us, you agree to the collection, use and disclosure of your personal data in the manner described in this policy.

- **Collection Use and Storage of Personal Data**

The type of personal data that LEGATE may collect from individuals will depend upon the particular transaction and the dealing. Normally the personal data collected by LEGATE may include an individual's:

- name, title, address.
- personal identification and/or passport number.
- telephone number.
- email address and online passwords.
- records of communications with LEGATE.
- responses to market surveys and contests conducted by LEGATE or on LEGATE's behalf.
- credit card or debit card information.
- camera or video footage that identifies individuals (including CCTV footage).
- website usage information.

LEGATE only collects, uses, and discloses personal data with an individual's consent or deemed consent or as otherwise permitted under the PDPA or other applicable laws and regulations.

Personal Data will, generally, only be collected and used for the primary purposes of:

LEGATE takes reasonable steps to ensure the individual is aware of:

- conducting, improving, maintaining, and developing a business relationship.

- processing, servicing, or enforcing transactions and sending related communications.
 - identification and verification purposes in connection with any of the services or products that may be supplied to individuals.
 - responding to individual's queries.
 - administering contests or market surveys conducted by LEGATE or on LEGATE's behalf
 - marketing (such as providing individuals with information about our products and promotional notices and offers); and
 - improving the LEGATE's website.
 - the likely use of the information.
 - the means of requesting LEGATE on the provision of personal data that is in the possession of LEGATE.
 - the means of withdrawing any consent in respect of the collection, use or disclosure of the personal data that is in the possession of LEGATE.
 - the identity and contact details of the organization.
 - any law requiring collection of the information; and
 - the main consequences of failure to provide the information.
- **How will LEGATE disclose your Personal Data?**

LEGATE discloses personal data:

- for the primary purpose for which it was collected; or
- for purposes that a reasonable person will consider appropriate in the circumstances; or
- where the individual has consented; or
- for direct marketing by LEGATE where consent has been given but giving individuals the opportunity to opt out of such direct marketing. LEGATE includes its contact details in any direct marketing; or
- where permitted under the PDPA or other applicable law or if required by law.

LEGATE does not disclose your personal data for any secondary purposes unless your consent has been given or if so permitted or required under the PDPA or other applicable laws and regulations.

LEGATE will not sell or license any personal data that it collects from an individual.

There may be other situations where we may collect and use personal data, which are outside a person's reasonable expectation. When this occurs, LEGATE is committed to providing the individual with an explanation for the possible use of the personal data when asking for the individual's consent.

- **Accuracy and Correction of Personal Data**

LEGATE discloses personal data:

- LEGATE takes steps to ensure information is accurate and up to date by updating its records whenever changes to information come to its attention. LEGATE disregards information which seems, on a reasonable basis, be inaccurate or out of date by reason of the time which has elapsed since it was collected or by reason of any other information in its possession.
- If an individual has submitted personal data to LEGATE electronically or otherwise, and would like it corrected, then a written request should be sent by email to the Privacy Officer at admin@legate.com.sg or to the address below.
- LEGATE will comply with an individual's request to correct their personal data as soon as practicable.
- If LEGATE disagrees with any request to correct an individual's personal data on reasonable grounds, LEGATE shall annotate the personal data with the correction that was requested but not made.

- **Withdrawal of Consent**

An individual may withdraw his consent for the collection, use or disclosure of personal data by giving LEGATE reasonable notice by sending a written request (a) by email to the Privacy Officer at admin@legate.com.sg or (b) to the address below. LEGATE shall inform the individual of the likely consequences of the withdrawal of the consent. LEGATE will cease to collect, use or disclose the personal data upon such withdrawal unless otherwise permitted or required by the PDPA or other applicable laws and regulations.

- **Using our Website**

As with most websites, when you visit the LEGATE website or use an application on the LEGATE website, LEGATE may record anonymous information such as IP address (where not used to identify a specific individual), time, date, referring URL, pages accessed and documents downloaded, type of browser and operating system.

LEGATE also uses "cookies". A cookie is a small file that stays on your computer until, depending on whether it is a sessional or persistent cookie, you turn your computer off or it expires. Cookies may collect and store your personal data. You may adjust your internet browser to disable cookies. If cookies are disabled, you may still use the LEGATE website www.legate.com.sg but may be limited in the use of some of the features.

The LEGATE websites may contain links to or from other websites. LEGATE is not responsible for the privacy practices of other websites. This privacy policy applies only to the information we collect on the LEGATE website. We encourage you to read the privacy policies of other websites you link to from LEGATE's website.

- **Security of your Personal Data**

LEGATE will take reasonable steps to ensure that personal data is securely stored.

LEGATE protects personal data from misuse or loss by restricting access to the information in electronic format and by appropriate physical and communications security.

Any data destroyed is disposed of in a manner that protects the privacy of personal data in an appropriate manner.

- **Dealing with Unsolicited Information**

LEGATE takes all reasonable steps to ensure that all unsolicited information is destroyed immediately.

- **Access to Personal Data**

If an individual wishes to be provided with information regarding their Personal Data that is in the possession or under the control of LEGATE or the ways in which such Personal Data has been used or disclosed by LEGATE in the year preceding such request, then that person needs to send a written request by email to the Privacy Officer at admin@legate.com.sg or to the address as detailed below. LEGATE will handle such requests as soon as reasonably possible in accordance with the PDPA.

- **Anonymity when dealing with LEGATE**

LEGATE allows individuals the option not to identify themselves when dealing with it, where practicable.

- **Cross Border Disclosure**

Any personal data provided to LEGATE may be transferred to, stored by, or disclosed to an overseas recipient. For example, LEGATE may use a server hosted overseas to store data, which may include your personal data.

Your personal data may also be processed by employees or by other third parties operating outside of Singapore, who work for LEGATE, or by the representatives and employees of LEGATE's parent company.

LEGATE will take reasonable steps, in the circumstances, before your personal data is disclosed to an overseas recipient, to ensure that the overseas recipient provide a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

- **Sensitive Information**

LEGATE does not collect sensitive information without the individual's consent and unless it is specifically relevant and necessary for LEGATE's primary purposes of conducting, improving, maintaining and developing a business relationship. All sensitive information is collected and used in accordance with this privacy policy. LEGATE does not use government identifiers (e.g., tax file numbers) to identify individuals.

- **DNC Registry**

LEGATE complies with all provisions regarding the DNC Registry under the PDPA.

- **Other Important Information**

LEGATE reserves the right to modify this privacy policy at any time. A current version of this policy will be published on LEGATE's website or may be obtained free of charge upon request.

- **Further Information**

If you have any queries or concerns about LEGATE's privacy policy, please contact:

LEGATE Privacy Officer
T-SPACE, 1 Tampines North Drive 1 #08-32
Singapore 528559
Email: admin@legate.com.sg

- **The Singapore Addendum to the LEGATE Global Privacy Policy**

This addendum supplements, details or modifies the LEGATE Global Privacy Policy in accordance with the applicable local data privacy law, its implementing rules and regulations and related issuances of the local data privacy regulator (collectively referred to herein as "Law").

This addendum applies to the processing of personal data by **LEGATE, LEGATE ENTERPRISE PTE LTD, LEGATE LIFESTYLE PTE LTD.** (collectively, "LEGATE" or "we" hereinafter). For this purpose, the term "processing" shall include, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of personal data.

Personal data

Singapore law defines personal data as data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which the organization has or is likely to have access.

The personal data collected by LEGATE may include, but not limited to, the following:

- name, title, address.
- personal identification and/or passport number.
- telephone number.
- email address and online passwords.
- records of communications with LEGATE.
- responses to market surveys and contests conducted by LEGATE or on its behalf.
- credit card or debit card information.
- camera or video footage that identifies individuals (including CCTV footage) installed at some parts of LEGATE's premises as part of its security infrastructure.
- username, password, and other identifiers when you register at LEGATE's website.

In processing personal data, we will take into account the nature of its sensitivity and will only process sensitive data upon the express consent of the data subject and only for purposes it was provided, or in accordance with law.

In processing sensitive data, LEGATE will inform data subjects of the sensitive data that is necessary to fulfill the core functionality of the product or service, and the consequences of refusal to the processing, for the purpose of allowing the data subjects to decide whether or not to give consent.

Collection, Purpose of Collection and Processing of Personal Data

Personal data will, generally, only be collected and used for the primary purposes of:

- communicating with employees, customers, contractors, suppliers, agents or any other individuals.
- conducting, improving, maintaining, and developing a business relationship and/or for employment purposes.
- general HR administration and information required for the management of the employment relationship.
- processing, servicing, or enforcing transactions and sending related communications.
- identifying and verifying individuals that have been supplied with any LEGATE services or products.
- administering customer orders or managing projects.
- responding to an individual's queries.
- administering contests or market surveys conducted by LEGATE or on LEGATE's behalf.

- marketing with consent (such as providing individuals with information about LEGATE products and promotional notices and offers).
- processing your purchase, application, inquiry, or request.
- ensuring IT security and resource management.
- ensuring site security.
- compliance with applicable laws and regulations of regulatory authorities and enforcement agencies.
- administrative purposes such as billing, payment, and debt collection.
- responding to any claim and/or legal process; and
- improving LEGATE's website.

Disclosure

LEGATE discloses personal data:

- for the primary purpose for which it was collected; or
- for purposes that a reasonable person will consider appropriate in the circumstances; or
- where the individual has consented; or
- for direct marketing by LEGATE where consent has been given, but individuals will be given the opportunity to opt out of such direct marketing. LEGATE includes its contact details in any direct marketing; or
- where permitted by law.
- to LEGATE's parent, related, affiliate and/or associate company.
- in any court of law or any relevant party in connection with any claim or legal proceedings, legal firms and/or advisors, debt collection agencies, credit reporting agencies and/or credit providers.
- to any payment agencies including, but not limited to, financial institutions for purposes of maintaining financial records, assessing, or verifying credit, and facilitating payment.
- regulatory authorities and enforcement agencies.
- third party service providers, consultants, insurers, underwriters, auditors, and advisors as well as their respective agents and/or contractors on a need-to-know basis; and
- any actual or potential assignee, transferee, or acquirer of any of LEGATE's business in connection with any corporate exercise.

LEGATE does not disclose your personal data for any secondary purposes unless your consent has been previously obtained in accordance with law.

LEGATE will not sell or license any personal data that it collects from an individual.

In situations where LEGATE processes personal data outside reasonable expectations, LEGATE will require your consent prior to processing.

Cross-border disclosure

Any personal data provided to LEGATE may be transferred to, stored by, or disclosed to an overseas recipient. For example, LEGATE may use a server hosted overseas to store data, which may include your personal data.

Your personal data may also be processed by employees or by other third parties operating outside of Singapore in countries like the United States of America or in the European Union, who work for LEGATE, or by the representatives and employees of LEGATE's parent company and affiliates.

LEGATE will take reasonable steps, in the circumstances, before your personal data is disclosed to an overseas recipient, to ensure that the overseas recipient does not breach privacy laws in relation to your personal data. In this regard, LEGATE has a Transborder Data Flow Agreement in place that requires foreign recipients of your personal data to provide a standard of protection comparable to the protection under the Personal Data Protection Act of 2012 (PDPA).

Data breach

Where a suspected data breach has occurred, LEGATE will act in accordance with its data breach response plan. In the event that LEGATE has determined that a data breach has occurred, we will notify the local data privacy regulator and affected data subject (s) in accordance with law.

Anonymity

LEGATE gives individuals the option not to identify themselves when dealing with it, where practicable. However, if you do not provide us with the personal data that we request, our ability to handle your inquiry, request, complaint or application may be diminished.

Consent and limitation in the processing of personal data

You may choose whether or not to provide your personal data, and, if already provided, you may choose to exercise your right to object, block, or remove such personal data as provided by law. If you would like to exercise your right to object, block, or remove your consent, please contact LEGATE using the contact details below.

In this case, however, we may not be able to adequately provide you the assistance or services you requested.

When you object, block or remove your consent, LEGATE shall no longer process your personal data, except in cases allowed or required by law.

If you would like to update, correct, or access your personal data, please contact us using the contact details below.

Inquiries and Complaints

If you have any queries or concerns about LEGATE's privacy policy, this addendum or about our use of your personal data, you may write to us using the following contact details:

Email: admin@legate.com.sg

LEGATE

Attn: Data Protection Officer

1 Tampines North Drive 1

T-SPACE, #08-32

Singapore 569059