

## PRIVACY POLICY

Last Updated on 31<sup>st</sup> October 2018.

We at **WHIZZL PTE. LTD.** (“Whizzl”, “we,” “us,” “our”) take our responsibilities under Singapore’s Personal Data Protection Act 2012, any regulations thereunder, and any guidelines that may be issued from time to time by the Personal Data Protection Commission (collectively referred to as the “PDPA”) very seriously.

The purpose of this document (“**Policy**”) is 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.

Please read this Policy carefully to understand how we may collect, use and disclose your personal data, whether through our website at [Privacy Policy](#) or the Whizzl mobile application (each an “**Application**”), or otherwise in the course of our normal business operations.

### 1. Consent

By accessing the Application and/or providing personal data to Whizzl, you acknowledge that you have read this Policy and that you consent to the collection, use and disclosure of your personal data by Whizzl in accordance with this Policy as amended or updated from time to time. If you do not consent to the terms of this Policy (or variation thereof), please do not access the Application or provide your personal data to Whizzl.

We reserve the right, at our sole discretion, to vary any parts of this Policy at any time for reasons. You should periodically visit this page to review the current privacy policy terms so that you are aware of any variation to which you are bound. If we vary this Policy, we will either post the changes to this Policy on the Application and update the “Last Updated” date at the top of this Policy or notify you of such variation by email at the email address registered in your account with Whizzl. Your continued use of the Application after any such variation constitutes your acceptance of the latest terms of the Policy.

If you provide personal data on behalf of someone else when you register for an account, you warrant that you have obtained the authorisation from that person to provide such personal data on his/her behalf and you agree to indemnify and hold harmless Whizzl from any claim that such authority did not exist. If your account is registered by someone else on your behalf and by using the Application through your account, you are deemed to have agreed to the terms of this Policy.

### 2. Unsolicited Information and Exclusions

This Policy shall not apply to any unsolicited information you provide to Whizzl through the Application or any other means.

Whizzl does not knowingly collect or solicit personal data from those below the age of 18, or knowingly allow such persons to register an account. If you are under 18, please do not use the Application, or attempt to register an account or send any personal data about yourself to us.

Access to and use of the Application and/or our services may be limited in scope to certain geographical territories. If our services are not available in the country in which you reside, please do not use the Application, or attempt to register an account or send any personal data about yourself to us.

### 3. What is Personal Data?

“Personal data” means data about a person who can be identified (i) from that data, or (ii) from that data and other information to which Whizzl has or is likely to have access.

### 4. What personal data does Whizzl collect?

We gather various types of personal data of our users, as explained more fully below.

**Data that is voluntarily provided:** Whizzl collects personal data that you voluntarily provide to us. At various places on the Application, or in the course of obtaining the services provided by Whizzl, you may be required to provide certain personal data such as your full name, email address, address, country of residence, telephone number and other personal information, in order to access or use certain features or services of the Application, or to otherwise obtain our services. For example, personal data may be collected when you

register an account, enter into any transaction with a third party provider through the Application, enter a contest, promotion or survey, fill up a form, provide comments, suggestions or feedback, or when you contact our customer service or helpdesk via email, phone or other channels. You can choose not to provide your personal data, but you may not be able to access or use certain features or services of the Application, or to obtain certain services from us. Whenever you volunteer personal data, you are consenting to the manner in which it will be handled in accordance with this Policy.

**Data that is sent automatically:** In addition, Whizzl collects data that is sent automatically by your web browser, computer, mobile or tablet device. This may include your IP address, the address of the web page you were visiting when you accessed our Site, date and time of your visit, information about the device you are using and other information. Please check the settings of your browser and/or device if you want to know what data is automatically sent or if you wish to change your settings. Please also refer to the section on “Use of Cookies” below.

## **5. How do we use your data?**

Generally, we collect personal data in order to provide our services to you, to facilitate the provision of those third party products and services which you have expressed interest in, and to personalize and improve our services and your user and customer experience with Whizzl.

Personal data collected by Whizzl may be used:

- (a) to provide you with service information, and news;
- (b) to support the services offered on the Application;
- (c) to contact you for feedback about our services;
- (d) to conduct research about Whizzl’s customer base or services;
- (e) to fulfil your reservation and purchase requests;
- (f) to inform you of promotions, offers, surveys, events, products and services, which may be of interest to you;
- (g) to process your payments including credit cheques and collection;
- (h) to customise your online experience according to your chosen interests and preferences and enhance your current and future visits to the Application and customer experience with us;
- (i) to notify you of technical updates or changes in policy;
- (j) to update and back-up our records;
- (k) to reduce credit risk, detect and protect us against error, fraud and other criminal activity;
- (l) to comply with law, the requests of law enforcement and regulatory officials, or orders of court;
- (m) to enforce our legal rights and remedies; or
- (o) for such other purposes notified to you on or before collection or use of the data.

## **6. Who do we disclose your data to?**

We do not trade or sell your personal data. Your personal data will not be disclosed by Whizzl to any third party, except:

- (a) to any affiliate, subsidiary or partner of Whizzl; our technology, marketing and logistics service providers; credit card and payment processing companies; lawyers, auditors, professional advisors and investors of Whizzl; or any other agents, service providers or subcontractors acting for or on behalf of Whizzl, to the extent required to carry out the purposes set out in Section 5 above, or to do anything at your request; or
- (b) where you expressly consent to such disclosure; or
- (c) where such disclosure is required or permitted by applicable law, statute, stock exchange regulation or by-law, regulatory or governmental order or court order; or

(d) in the event of a corporate sale, merger, reorganization, dissolution or similar event, personal data may be part of the transferred assets;

We may collaborate with other third parties to organise joint marketing and promotional campaigns, and may require disclosure of your information to such third parties. You may not be able to enjoy the promotion, offer or participate in the contest, unless you consent to disclosure of your information to our partner.

Recipients of your personal data may be located outside Singapore. You agree that we may transfer your personal data to our affiliates, subsidiaries and/or other third parties located outside of Singapore, as long as the personal data is handled in accordance with this Policy and all applicable laws. Whizzl will ensure recipients of your personal data are legally bound to provide a standard of protection for your personal data comparable to the protection afforded under the Personal Data Protection Act 2012 (No. 26 of 2012) ("PDPA").

#### **7. How long do we retain your data?**

Personal data provided by you will be retained as long as the purpose for which the data was collected continues. Thereafter, Whizzl will destroy or delete the information, or remove the means by which the data can be associated with you, unless its retention is required to satisfy legal, regulatory, accounting or other business requirements or to protect Whizzl's interests.

#### **8. Supplemental Privacy Policies**

When certain additional or optional services ("Additional Services") are offered to or requested by you, separate or supplemental privacy policies may apply for those Additional Services as the needs and choices of each user may vary. The separate or supplemental privacy policies would explain the types of information we collect, their purposes of use, and other policies that may apply to the relevant Additional Services. When you choose to use an Additional Service, you will be informed of the relevant applicable privacy policies, which supplements or modifies this Policy before you can access that Additional Service.

#### **9. Security of Data**

9.1 Your account is protected by your password for your privacy and security. We ask that you take steps to protect against unauthorised access or use of your account. You are responsible for any loss, theft and compromise of your password and account information, and any activity on your account that takes place through unauthorised password use.

9.2 Whizzl understands the importance of keeping your personal data private and secure. We therefore put in place security arrangements to protect your privacy and personal data, in a manner that we believe is reasonably appropriate to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. Please be informed that despite our best efforts, no security measures are impenetrable. Unauthorised entry or use, hardware or software failure, and other factors, may compromise the security of your personal data. Whizzl does not warrant or guarantee in any way that your personal information or private communications will always remain private and/or safe. Whizzl hereby disclaims any responsibility or liability directly or indirectly arising out of or in connection with, any loss, theft, or unauthorised access, collection, use, disclosure, copying, modification, disposal or similar actions with regard to any personal data held or maintained by us, except to the extent caused by our fault or negligence.

#### **10. Linked Sites**

Whizzl may provide links to other sites ("Linked Sites") that may be of relevance and interest to you. Whizzl has no control over, and are not responsible for the privacy practices or the content of such Linked Sites, and you hereby waive any claim against us with respect to the Linked Sites. This Policy applies only to the Application and our services only, and does not apply to information you provide directly to any other parties via such Linked Sites. Having the Linked Sites on the Application do not imply that Whizzl endorses or have reviewed the Linked Sites. We suggest you to contact those Linked Sites directly for information on their privacy policies before providing any of your personal data.

#### **11. Use of Cookies**

In order to improve our products and services, we collect data by way of "cookies". Cookies help us measure the number of visits, average time spent, page views and other statistics relating to your access to the Application. This information allows us to better administer the Application, and provide a more tailored and

user-friendly service to our Application' visitors and users. Cookies also enable you to use or access certain features or services of our Application, including the shopping cart and check-out features. For example, cookies help us store preferences or retrieve products in your shopping cart between visits, from our servers. Cookies are small data files that are sent to your browser from our Application and are stored on your computer's or device's hard drive. Each time you visit our Application from the same computer or device, the cookie will be retrieved from your computer or device, enabling our Application to recognise your computer or device as having previously visited our Application and thereby increase the functionality of our Application on your computer or device. Our cookies cannot be used to get data from your hard drive, to get your email address or any other data that can be traced to you personally. Most web browsers and devices can be set to notify you when you receive a cookie or to prevent cookies from being sent; if you use these features, you may limit the functionality we can provide you when you visit our Application.

We use the following cookies which provide to us the information listed at the description section:

Cookie's name	Description
laravel_session	Track the web app login session
_ga	Google Analytic Cookies
_gid	Google Analytic Cookies

## 12. How to access and correct your data?

If you wish to access, correct or update your personal data, you may do so at any time by accessing your Account settings through the Application. Alternatively, you may contact us at [contactus@whizzl.com](mailto:contactus@whizzl.com). You are responsible for providing us with correct and updated information.

## 13. What choices do you have?

13.1 Keep in mind that the information we gather is in an effort to offer you a superior customer experience that is customized. You may be able to access, correct or update certain information as explained in Section 12 above.

13.2 You may request deletion of your account by sending an email to [support@whizzl.com](mailto:support@whizzl.com). Please note that some information may remain in our private records after deletion of your account. We may use any aggregated data derived from or incorporating your personal data after you delete your account, but not in a manner that would identify you personally unless permitted by law.

13.3 If you do not wish to receive email or other communications from us, you can unsubscribe from our mailing list by using the unsubscribe facility that may be provided with such email or communication, or contact us at [support@whizzl.com](mailto:support@whizzl.com).

## 14. Questions or Concerns

Please direct any questions or concerns that you may have regarding our handling of your personal data to:

Attn: The Data Protection Officer

Email: [support@whizzl.com](mailto:support@whizzl.com)

Please provide your name, contact number, email address and all relevant details along with your question or concern, so that we can review and respond to your question or concern in an efficient and effective manner.

## 15. Governing Law

Irrespective of the country from which you access or use our services and/or Application, to the extent permitted by law, this Policy is governed by and shall be construed in accordance with Singapore law without giving effect to any principles of conflicts of law. You agree to submit to the exclusive jurisdiction of the Singapore courts to resolve any claims or disputes which may arise in connection with this Policy.