

# **Fragrance Group Limited**

## **Personal Data Protection Policy**

*(Updated as at 11 November 2019)*

### **1. Overview and Scope**

Your personal data privacy is important to us. Fragrance Group Limited (Co. Reg. No: 200006656M), and/or its related corporations and affiliates ("**Fragrance**") collectively or singularly as the context requires is highly committed in respecting and managing your Personal Data collected in line with this Personal Data Protection Policy ("Policy").

This Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which any member of the Fragrance Group may have at law to collect, use or disclose your Personal Data. This Policy does not affect any rights which we may have at law in connection with the collection, use or disclosure of your Personal Data.

This Policy sets out the collection, use and disclosure of your Personal Data. "Personal Data" means any data or information, whether true or not, about an individual who can be identified either (a) from that data; or (b) from that data and other information to which Fragrance is likely to have access to.

Personal Data excludes Business Contact Information which means an individual's name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for his personal purposes.

### **2. When and what kind of Personal Data do we collect?**

2.1 Fragrance may collect, use and disclose the following data about you:

2.1.1 When you provide Personal Data by filling in online or hardcopy forms when applying for Fragrance's services or feedback, asking queries, requests and other submissions (including signing up for alerts/newsletters, if any);

2.1.2 If and when you contact Fragrance (i.e. telephone calls, online chat programmes, social media (i.e. Facebook, etc.), faxes and emails), we may keep a record of that correspondence;

2.1.3 Details of your visits to our website including, but not limited to, cookies, location data, weblogs and other communication data, that you access;

2.1.4 When you fill up online and hardcopy job application forms to apply for a job at Fragrance (either directly or via online job and recruitment portals, etc.);

2.1.5 If you enter into any contract with Fragrance, or to purchase or lease any products/services from Fragrance;

2.1.6 If you participate in any show flats, exhibition, event, roadshow or workshop organised by Fragrance or its authorized agents/representatives or where Fragrance is a participant;

2.2 Fragrance may collect the following kinds of Personal Data through the different channels mentioned above:

2.2.1 Full name;

2.2.2 NRIC/ID/Passport numbers, if applicable;

2.2.3 Business and/or residential addresses;

2.2.4 Business and/or personal email addresses;

2.2.5 Mobile and business telephone numbers;

2.2.6 Bank account details, if necessary;

2.2.7 Vehicle license plate numbers and corresponding IU numbers, if applicable.

2.3 Additionally, if you are applying for employment with Fragrance, Fragrance will collect the following:

2.3.1 Nationality;

2.3.2 Citizenship;

2.3.3 Marital Status;

2.3.4 Date of Birth;

2.3.5 Gender;

2.3.6 Race;

2.3.7 Educational history and qualifications;

2.3.8 Next of Kin, family or emergency contact information;

2.3.9 Employment history and professional qualifications, including testimonials and references;

2.3.10 Medical, legal and financial history;

2.3.11 Curricula Vitae, if any;

2.3.12 Photos and CCTV videos, if applicable;

2.3.13 Biometrics (i.e. fingerprints).

### **3. What purposes does Fragrance Collect, Use and Disclose Personal Data?**

Fragrance may use the information we collect from you for any of the following purposes:

3.1 To perform or carry out Fragrance's obligations arising from any contracts entered into between you and us;

3.2 To enable Fragrance's subcontractors, third-party agents and service providers, to fulfil obligations/services as stipulated in your contract with Fragrance;

3.3 To handle products and services requests and enquiries;

3.4 For payment administration purposes;

3.5 To administer and update your records in our databases; monitoring and maintaining a copy of your record of previous transactions;

3.6 To facilitate the delivery, maintenance and enhancement of Fragrance's products and services;

3.7 To plan, monitor, and enhance the provision of new products, services, projects, and planning of events;

3.8 To improve Fragrance's customer service through your feedback;

3.9 To facilitate data analysis and business planning purposes;

3.10 To process your enquiries and any and all other ancillary administrative purposes;

3.11 For communications, sales and marketing efforts and leads generation and publicity purposes, including but not limited to marketing events, initiatives and promotions, lucky draws, membership and rewards schemes and other promotions;

3.12 For vendor management and communications purposes;

3.13 For government, audit and other regulatory purposes (including but not limited to Singapore, UK and Australia);

3.14 For recruitment and evaluation purposes if you apply for a job with Fragrance, i.e. to determine candidates' suitability;

3.15 To apply for employee work visas at the Ministry of Manpower;

- 3.16 To prevent and detect crime, and to analyse and manage other commercial risks;
- 3.17 For security, safety surveillance and monitoring purposes;
- 3.18 For internal reporting and/or accounting purposes;
- 3.19 To comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities;
- 3.20 To administer Fragrance's relationship with its shareholders, including the verification of identity and/or the identities of your proxy (as may be applicable);
- 3.21 To inform you of Fragrance's performance and the products and services that Fragrance provides to our customers through the sending of circulars, reports, newsletters and communications, if you are a shareholder of Fragrance; and
- 3.22 Purposes incidental to each or all of the above.

We may also contact you by any means of communication for which you have given us contact details, including but not limited to via email, telephone numbers, and post, for the purpose of getting your feedback or for providing you with information which we believe could be of interest to you or your organisation.

By your submission of your Personal Data to us, you consent to the onward disclosure of your Personal Data to these agents or service providers (as set out in no.3 of *"What purposes does Fragrance collect, use and disclose personal data?"*) and the processing of your Personal data by these agents or service providers.

We only collect, process, use or disclose such Personal Data, in accordance with this Policy. If you are acting as an intermediary, or otherwise on behalf of a third party, or supply us with information regarding a third party, you undertake that you are an authorised representative or agent of such third party and that you have obtained consent from such third party to our collection, processing, use and disclosure of their Personal Data. Because we are collecting the third party's data from you, you undertake to make the third party aware of all matters listed in this Policy by referring them to our agencies' website.

#### **4. Consent for the collection and use of your Personal Data**

You consent to the collection, use and disclosure of your Personal Data for the above mentioned purposes and agree to be bound by the obligations it imposes on you, when you accept this Policy. You accept this Policy when you continue to browse on Fragrance's website or continuing to engage with Fragrance.

In this regard, please note that it is on your part to ensure that all personal data submitted to us is complete, accurate, true and correct at the time of submission. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

Please note that if you do not consent to any of the above business purposes, Fragrance may also be unable to meet the purposes for which the information was collected.

#### **5. Does Fragrance disclose Personal Data to third parties?**

Fragrance may disclose your Personal Data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Act (Cap. 50).

On occasion, Fragrance may use third party agents and service providers to assist us in the use of your Personal Data as outlined under *"What purposes does Fragrance Collect, Use and Disclose Personal Data?"* You consent to such use of your Personal Data by continuing to browse on Fragrance's website or continuing to engage with Fragrance.

Fragrance will not transfer Personal Data within or outside Singapore unless it is ensured that the Personal Data will be accorded a level of protection which is comparable to the protection under the PDPA.

#### **6. For how long does Fragrance retain your Personal Data?**

Fragrance will cease to retain Personal Data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

#### **7. Does Fragrance use cookies to collect and use Personal Data?**

When you visit any of Fragrance's websites, Fragrance may collect or analyse anonymized information from which individual information will not be identified. The information collected may include the number of users and the amount of time they stay on our website, which countries they are from, and what mode of device they are currently using to view our website, as well as domain information that helps us to learn our client's profile, the frequency of viewing. We use this information to improve our website's content and navigation.

Some parts of this website may use cookies, which enable us to track usage patterns, enforce security, and offer you a customized content. A cookie is a small text file that our server places on your computer hard drive as a unique identifier.

Note that our cookies do not have an expiration date and do not collect personally identifiable information.

You may disable the use of cookies by selecting the appropriate settings on your browser. This may however result in you being unable to experience the full functionality of the websites.

#### **8. How does Fragrance protect your Personal Data?**

The Personal Data that we hold about you may be stored on servers hosted in Singapore, UK and Australia, and on cloud servers used by Fragrance hosted in Singapore. Fragrance implements a variety of security measures to maintain the safety of your submitted information. All electronic

storage and transmission of personal data is secured and stored on managed servers with controlled access and appropriate security technologies.

Although every reasonable effort has been made to ensure that all personal data will be so protected, Fragrance cannot be responsible for any unauthorised use or misuse of such information and from risks which are inherent in all internet communications.

Your Personal Data will only be disclosed for the express purpose of delivering the product or service requested and shall not be sold or disclosed to any other company for any other reason whatsoever without your consent.

#### **9. Links to third party websites from Fragrance's website**

Our websites may contain links to other external websites, such as our business partners. We are not responsible for the privacy policies and practices of these websites taken care of by third-parties. We strongly encourage you to check the privacy policy of each website that you visit. Some of these third-party websites may have our logo or trademark acknowledged on their website. However, these websites are not operated and maintained by us. Please contact the owner of the respective websites should you have any questions on their privacy policies.

#### **10. Access and Correction of Personal Data**

Please contact us via [dpo@fragrancegroup.com.sg](mailto:dpo@fragrancegroup.com.sg) should you wish to have access to or seek to update, correct or withdraw the consent to collect and use your Personal Data. Your email should identify yourself and state which Personal Data and information about its use and/or disclosure is requested.

We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

#### **11. Further Information**

If you are concerned about the handling of your Personal Data, or if you have any complaints or queries related to your Personal Data or our Policy, please contact Fragrance's Data Protection Officer ("DPO") at [dpo@fragrancegroup.com.sg](mailto:dpo@fragrancegroup.com.sg).

Fragrance reserves the right to change this Policy with or without notice from time to time.