

LAST UPDATED: 22 Nov 2021

This is the privacy policy (“**Policy**”) for the Tim Ho Wan rewards programme (“**Loyalty Programme**”) by Dim Sum Pte. Ltd. (“**THW**” or “**we**” or “**our**” or “**us**”) accessed via the web portal found at <http://rewards.timhowan.com/> (“**Online Platform**”). This Policy is based on the Personal Data Protection Act 2012 and all the associated regulations and guidelines as may from time to time be issued by the Personal Data Protection Commission of Singapore.

We take your privacy very seriously and have in place policies and practices dealing with data protection. We ask that you read this Policy carefully as it contains important information about our collection, use, processing and disclosure of personal data in our possession or under our control, including information on:

- i) our policies and practices for meeting our obligations under laws, regulations and guidelines which concern data protection;
- ii) how you may access, correct or make other requests in relation to your personal data in our possession or control as permitted by applicable laws; and
- iii) details of our data protection complaints procedure.

1. COLLECTION OF PERSONAL DATA

1.1 Personal data that THW collects include [*name, email address, date of birth, phone number, location data, gender*] and other relevant information in order for us to provide products and/or services and to share information that may be of interest.

1.2 Personal data may be collected by us, directly or indirectly, for instance:

1.2.1 when you register for an account on the Online Platform;

1.2.2 when you respond to our promotions, or subscribe to our mailing lists;

1.2.3 when you use our services or enter into transactions with us, or express any interest in doing so;

1.2.4 when you communicate with us by telephone, email, via our website or through other communication channels including social media platforms;

1.2.5 when we seek information about you and receive your personal data in connection with your relationship with us;

1.2.6 when you submit your personal data to us for any reason.

1.3 We also collect personal data from third party sources, for example:

1.3.1 from our business partners and third party service providers;

1.3.2 from public agencies or other public sources.

- 1.4** In certain circumstances, you may also provide us with personal data of persons other than yourself. If you do so, you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes, including all purposes as set out in this Policy.

2. PURPOSES OF COLLECTION, USE OR DISCLOSURE

- 2.1** We may collect, use, process, store and/or disclose your personal data for one or more of the following purposes:

- 2.1.1** to provide, operate, maintain, improve, market or promote the Online Platform and/or the Loyalty Programme;
- 2.1.2** to facilitate redemption activities (for example, to verify your identification and process your redemption);
- 2.1.3** to process and respond to your enquiries, feedback, requests, complaints or incident reports;
- 2.1.4** to inform you of promotions and updates;
- 2.1.5** to send you marketing materials;
- 2.1.6** to generate internal reports such as annual, operational or management reports and to conduct statistical, trade or other forms of analysis;
- 2.1.7** to improve our services (for example, if you participate in our surveys, we may use your feedback/suggestions to improve the Loyalty Programme);
- 2.1.8** to resolve any disputes which may arise between the Company and you;
- 2.1.9** to comply with applicable laws; and/or

- 2.2** We may also collect, use, process, store and/or disclose personal data for purposes related to for which you have provided the personal data, in circumstances other than set out in this Policy where required, or permitted, by laws applicable to us or in any relevant jurisdiction, or where we have obtained your consent through other means (for example, pursuant to notices at our premises).

- 2.3** The purposes listed in the above clauses may continue to apply even in situations where your relationship with us has been terminated or altered in any way (for example, where we use personal data to enforce our rights under a contract with you).

3. THIRD PARTIES WHO MAY BE PROVIDED WITH PERSONAL DATA

- 3.1** THW may disclose your personal data to the following, whether located within or outside Singapore, for the purposes set out or otherwise referred to in this Policy: (a) third parties to whom you authorise THW's disclosure of your personal data (through this Policy or otherwise), (b) THW's auditors, professional consultants, lawyers and other advisors, (c) THW's business partners, (d) THW's service providers or agents, (e) insurers, credit providers, courts, tribunals, law enforcement agencies, regulatory authorities and other governmental agencies as agreed or authorised by law.

4. ACCURACY

- 4.1** We generally rely on the accuracy of personal data provided by you or your authorised representatives. In order to ensure that our records of your personal data is current, complete and accurate, please update us if there are changes to your personal data by writing to our Data Protection Officer at the contact details at the end of this Policy.

5. SECURITY AND RETENTION

- 5.1** To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, and loss of any storage medium or device on which your personal data is stored, we have introduced appropriate administrative, physical and technical measures, including to protect personal data from unintended access.
- 5.2** You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure, and THW cannot and does not guarantee that our systems or applications are invulnerable to security breaches. THW makes no warranty, guarantee, or representation that your use of our systems or applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities.
- 5.3** We keep your personal data only for so long as we need the personal data to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including audit, accounting or reporting requirements. In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

6. ACCESS REQUEST/CORRECTION REQUEST

- 6.1** If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, (b) a correction request to correct or update any of your personal data which we hold about you, or (c) other request in relation to your personal data, as permitted by applicable data protection laws, you may submit your request by contacting the Data Protection Officer. You may be required to submit certain forms or provide certain information in order for your request to be processed. Where permitted by law, THW may charge you a reasonable fee to process your request, and will inform you of the fee before processing your request.
- 6.2** We will respond to your request as soon as reasonably possible, and in accordance with applicable law.

7. CONSENT WITHDRAWALS

- 7.1** The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you. You may withdraw consent and request us to stop using and/or disclosing your personal data by submitting a request in writing to our Data Protection Officer at the contact details provided below.
- 7.2** Upon receipt of your written request to withdraw your consent, we may require reasonable time for your request to be processed and for us to notify you of the consequences of us acceding to the same. In general, we shall seek to process your request within [fourteen (14)] business days of receiving it.

- 7.3** If you withdraw your consent to any or all use of your personal data or do not consent to the collection of your personal data by us, we may not be able to provide or continue providing you with all the features or aspects of the Loyalty Programme and/or the Online Platform or the products and/or services associated with the Loyalty Programme and/or the Online Platform. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, usage and disclosure without consent is permitted or required under applicable laws in any jurisdiction.

8. CHANGES TO THIS POLICY

- 8.1** We keep this Policy under regular review. If we change this Policy we will post the changes on or through the Online Platform, [<http://rewards.timhowan.com>], or such other means as we deem appropriate. Where you continue to provide personal data to us as described in this Policy, or continue to use the Loyalty Programme and/or the Online Platform, this will constitute your acknowledgement and acceptance of a revised Policy.

9. HOW TO CONTACT US / DATA PROTECTION OFFICER DETAILS

- 9.1** If you have any queries or comments on this Policy or the use of your personal data, or if you wish to lodge a privacy-related complaint, please contact THW's Data Protection Officer at:

Data Protection Officer: Lewis Tan

Email address: membership@timhowan.com

THW will investigate your queries, comments or complaint, and will use reasonable endeavours to respond, in accordance with applicable laws.

10. GOVERNING LAW

- 10.1** This Policy shall be governed by and construed in accordance with Singapore law.