

This Data Protection Notice ("**Notice**") sets out the basis which *Gold hub Jewellery* ("**we**", "**us**", or "**our**") may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act ("**PDPA**"). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

1. As used in this Notice:

"**customer**" means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

"**personal data**" means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, identification numbers such as nric, fin, work permit and birth certificate, residential address, email address, telephone number, nationality, gender, date of birth and marital status and product preferences.
3. "**non-personal data**" may include, but is not limited to information about your browser, your IP address, device ID, which website you came from, what advertisement you clicked on, whether on third party websites or our partner websites, what pages you visit on our partner sites, and other information about your online activities that does not identify you as an individual.
4. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

5. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your "**authorised representative**") after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
6. We may collect and use your personal data for any or all of the following purposes:

- (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
- (b) verifying your identity;
- (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- (d) managing your relationship with us;
- (e) processing payment or credit transactions;
- (f) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- (g) any other purposes for which you have provided the information;
- (h) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
- (i) any other incidental business purposes related to or in connection with the above;
- (j) Sending you information of our marketing and promotional activities and initiatives, lucky draw, membership and rewards scheme and other promotions;
- (k) Performing certain functions such as completing forms, facilitating website navigation, authentication, and enabling marketing and advertising technologies.

7. We may disclose your personal data:

- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you; or
- (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above mentioned purposes.

8. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in anyway, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

BEHAVIOURAL ADVERTISING

9. We also may use your Personal Data to provide you with targeted advertising or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at

<http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

10. You can opt out of targeted advertising by:

Facebook: <https://www.facebook.com/settings/?tab=ads>

Google: <https://www.google.com/settings/ads/anonym>

11. Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

WITHDRAWING YOUR CONSENT

12. 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 in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
13. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
14. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 11 above.
15. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

16. 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, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
17. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
18. We will respond to your request as soon as reasonably possible. In general, our response will be within ten (10) business days. 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).

PROTECTION OF PERSONAL DATA

19. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
20. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

21. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

22. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
23. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

24. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

NON-PERSONAL DATA

25. We may, or may allow third party companies we work with to, automatically collect, monitor and store certain non-personal data and information about visitors to our Website ("Non-Personal Data"). This includes, without limitation, information relating to site visitorship, our visitors' "click path" or "user journey" (e.g. which pages they have viewed, the time spent per webpage, the search terms or categories they have entered, the website or advertisement that was linked to or from our Website and the type of browser or operating system used to access our Website.. To do this, cookies and other similar technology may be used (see "use of cookies" below). Such information will be used to improve and enhance our Website and user experience, and/or to manage

online advertising (e.g. to deliver advertisements based on user interest and to measure advertising campaign effectiveness).

USE OF COOKIES

26. Our Website may contain or use “cookies”, “web beacons”, “pixel tags” or other similar technology (collectively, “Cookies”). Such Cookies enable (i) you to browse our Website and use certain features; and/or (ii) us or third party companies we work with to measure, research and analyse how our visitors use our Website, remember our visitors’ online preferences, and to manage online advertising (including delivering and serving advertisements to our visitors); but do not capture any information that can be used to identify you personally.
27. Most browsers allow you to (i) adjust or change the settings on your browser so that it deletes the Cookies stored on your device, blocks acceptance of Cookies or notifies you before a Cookie is stored on your device; or (ii) activate a “do-not-track” function. Please refer to the help and support sections on your browser or device for instructions on how to do this. Please note, however, that by blocking, deleting or disabling Cookies or by disabling the tracking function, some features, services, functions or parts of our Website may not be accessible or available to you or may not function properly. Otherwise, by using our Website, you consent to the (a) aforesaid collection, monitoring, storage and use of Non-Personal Data; and (b) storing of Cookies on your device and consent to us (or third parties we work with) accessing such Cookies when you visit our Website in the future.
28. We do not control and are not responsible or liable for any Cookies which are (i) contained in third party advertisements or Links on our Website or (ii) used by third party advertisers or third party web pages or websites which are linked to or from our Website (“Third Party Cookies and Links”). You agree that your access to and/or use of such Third Parties Cookies and Links is entirely at your own risk and subject to such third parties’ terms and conditions of access and/or use (including without limitation their privacy and data processing policies and practices). You should check such third parties’ privacy and data processing policies and practices to determine how they will handle any information and data (including personal data) they collect from you or which you provide to them.

DATA PROTECTION OFFICER

29. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, by filling in your request in the form below:
Contact us: <https://www.goldhub.com.sg/contact.php>

EFFECT OF NOTICE AND CHANGES TO NOTICE

30. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
31. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 21/08/2020

Last updated : 21/08/2020