

DATA PROTECTION POLICY

E-XCLUSIF MEDICAL SUPPLY PTE LTD is committed to protecting and respecting your personal data and privacy rights.

This policy (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

If you are under 18, please do not send any personal data about yourself to us.

1 **Personal data collection and how do we collect**

1.1 In order to provide a better service to you, we may collect and process the following data about you:

- (a) if you contact us, we may keep a record of that correspondence;
- (b) details of transactions you carry out through our site and of the fulfilment of your orders;
- (c) during interaction with our staff, including customer service officers and other representatives etc. via telephone calls, letters, fax, face-to-face meetings and email;
- (d) when you are applying for a job with us, during interviews, your service provider e.g. recruitment agency

1.2 Your personal data will always be handled by us in accordance with this Policy and the PDPA.

2 **Purposes for the collected personal data**

2.1 The purposes for which information may be used by us in and outside Singapore include:

- (a) ensuring that content from our site is presented in the most effective manner for you;
- (b) providing customer service e.g. responding to queries and requests; informing you about our product and service status and sending you email alerts;
- (c) carrying out our obligations arising from any contracts entered into between you and us;
- (d) allowing you to participate in interactive features of our service, when you choose to do so;

- (e) designing and conducting surveys/questionnaires for client profiling/segmentation, statistical analysis, improving and furthering the provision our products and services;
- (f) complying with laws and regulations applicable to us or any of our affiliates in or outside Singapore;
- (g) legal proceedings, including collecting overdue amounts and seeking professional advices;
- (h) researching, designing and launching services or products including seminars/events/forums;
- (i) promoting and marketing services and products subject to your exercise of the opt-out right (please see further details in Clause 2.2 below);
- (j) performing evaluations e.g. on suitability of employees
- (k) updating our records and keeping your contact details up to date or
- (l) purposes directly related or incidental to the above.

2.2 We may use your data in direct marketing and we require your consent for that purpose. In this connection, please note that:

- (a) your name, contact details (including address, contact number, email address), products and services information, transaction pattern and behaviour, background and demographic data held by us from time to time may be used by us in direct marketing;
- (b) the following classes of services, products and subjects may be marketed in direct marketing:
 - (i) services and products related to our site and/or our affiliates (including marketing affiliates programs we are a part of);
 - (ii) reward, loyalty or privileges programs, promotional offers and related services; and
 - (iii) invitations to events such as seminars/webinars/tele-seminars, conferences, live programs or events.
- (c) We may conduct direct marketing via fax, email, direct mail, telephone and other means of communication or send e-newsletters to you.

2.3 For withdrawal of consent for the purposes listed in section 2.1 and 2.2, you may notify us in writing to our contact details mentioned in Section 8.3.

3 **Disclosure of your information**

3.1 We will keep the personal data we hold confidential but may provide information to:

- (a) personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services;
- (b) our overseas offices, affiliates, business partners and counterparts (if any);
- (c) persons under a duty of confidentiality to us;
- (d) persons to whom we are required to make disclosure under applicable laws and regulations in or outside Singapore; or
- (e) actual or proposed transferees or participants of our services in or outside Singapore.

4 **Using our E-xclusif Website**

4.1 **Cookies:**

- (a) Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.
- (b) A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- (c) We use the following cookies:
 - (i) **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
 - (ii) **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to remember your preferences (for example, log in details).

4.2 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

4.3 You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

4.4 **Third party websites**

Our website may contain links to other sites (the "**Linked Sites**"). We are not responsible for the privacy policies or practices of such other Linked Sites. We encourage our users to be aware when leaving our website to read the privacy policies or statements of each Linked Site that collects your personal data. You agree to waive any claim against us with respect to the Linked Sites.

5 **Security**

5.1 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

5.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk and you agree not to hold us responsible for any breach of security while accessing the internet that is out of our control. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6 **Do Not Call Registry**

E-xclusif complies with all provisions regarding the DNC Registry under PDPA.

You may also, however, advise us in writing should you wish not to be contacted by us at your telephone or facsimile number(s) for any given purpose or all purposes.

7 **Data transfers**

Your personal data may be transferred, stored and/or processed in countries / territories outside Singapore and you consent to any such transfer, storage and/or processing of your personal data outside Singapore, where applicable.

We will take reasonable approach that any party to whom we transfer your personal data does not breach our Data Protection Policy or provide a standard of protection at least comparable to PDPA.

8 **Your consent and rights**

8.1 By using our service, making an application or visiting our website, you consent to the collection and use of your information and other activities as outlined in this policy.

8.2 Under the Personal Data Protection Act (the "**PDPA**"), individuals have the right:

- (a) to check whether we hold personal data about you and to access such data;
- (b) to require us to correct as soon as reasonably practicable any data relating to you that is inaccurate;
- (c) to ascertain our policies and practices in relation to personal data and the kind of personal data held by us; and
- (d) to object to the use of your personal data for marketing purposes and we shall not use your personal data for marketing purposes after you communicate your objection to us.

8.3 You may exercise your opt-out right by notifying us the collection, use or disclosure of your personal data and E-XCLUSIF will respect your choices in this regard. Please send requests for such objections, access to data, correction of data, information regarding policies and practices and kinds of data held, questions or complaints to:

E-XCLUSIF MEDICAL SUPPLY PTE LTD

2 KALLANG PUDDING ROAD, #05-08/07,
MACTECH BUILDING, SINGAPORE 349307

TEL: 67383525
FAX: 68425926
EMAIL: info@e-xclusif.com

Your request will be attended to promptly upon the receipt of your notice (estimated up to 4 weeks' processing time) for the change to take effect.

8.4 In accordance with the terms of the PDPA, we have the right to and may charge a minimum fee for processing any data access request.

9 **Retention of Personal Data**

The PDPA ACT requires not to store personal data longer than necessary. E-xclusif will retain your personal data only for as long as the purposes for which such data is collected or used (as notified to you) continues, or where necessary for our legal or business purposes.

Generally, we do not retain personal data for a period of longer than 7 years after the original purposes for which the personal data was collected have ceased to be applicable, unless otherwise required by law or other mandatory government authorities or for purposes of legal proceedings.

For unsuccessful job applicants, E-xclusif will retain your personal data for no longer than 1 year for the purposes of evaluating your suitability for future job openings within E-xclusif, unless you inform us.

When your personal data is no longer required, it will be destroyed or disposed.

10 **Changes to our Data Protection Policy**

Any changes we may make to our Data Protection Policy in the future will be posted on this page. Your continued use of our services constitutes your agreement to this policy and any updates.

11 **Governing law and jurisdiction**

Nothing in this Data Protection Policy shall limit the rights of the data subject under the PDPA. This Data Protection Policy shall be governed by the laws of Singapore. You agree to submit to the exclusive jurisdiction of the Singapore courts.

Last updated: **15 September 2017**