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## *Advantage Pilates Singapore Pte. Ltd Privacy POLICY (PDPA)*

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### **Privacy Statement**

This is the Advantage Pilates Singapore Pte. Ltd. Personal Data Protection Policy (“Personal Data Protection Policy”) and the purpose of this document is to inform you of how Advantage Pilates Singapore Pte. Ltd. manages, collects, uses and discloses your Personal Data, subject to the Singapore Personal Data Protection Act (No. 26 of 2012) (“the Act”).

When you submit information to us, or sign up as a customer on our website to purchase, view or otherwise surf any of the products or services offered by us (the “Products and Services”), you agree and consent to Advantage Pilates Singapore Pte/ Ltd (including its related corporations and business units) (collectively, the “Companies”), as well as their respective representatives and/or agents collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies’ authorised service providers and relevant third parties in the manner set forth in this Personal Data Protection Policy.

This Personal Data Protection Policy supplements but does not supersede nor replace any other consent you may have previously provided to Advantage Pilates Singapore Pte. Ltd. In respect of your Personal Data.

Advantage Pilates Singapore Pte. Ltd. may update this Personal Data Protection Policy to ensure that it is consistent with industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Personal Data Protection Policy as updated from time to time on our website.

### **Personal Data**

In this Personal Data Protection Policy, “Personal Data” refers to any data, whether true or not, about an individual 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, including data in our records as may be updated from time to time.

Examples of such Personal Data you may provide to us include your name, telephone numbers, email address, network data, medical conditions, and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

### **Collection of Personal Data**

Generally, Advantage Pilates Singapore Pte.Ltd. collects Personal Data, either directly from you or from your authorised representatives (i.e. persons whom you have authorised, persons who have been validly identified as being you or your authorised representative pursuant to our then-current security procedures), from third parties, or from publicly available sources or through our website in the following ways:

- when you submit a form for registering as a customer on our website or any other forms relating to any of our Products and Services
- when you interact with our team (Administrative and Service staff), for example, via telephone calls, letters, face-to-face meetings and emails
- when you use some of our services, for example, websites and including establishing any online accounts with us
- when you request that we contact you, or be included in an email or other mailing list
- when you respond to our promotions, initiatives or to any request for additional Personal Data
- when you are contacted by, and respond to, our marketing representatives and customer service team
- when we receive references from business partners and third parties, for example, where you have been referred by them
- When you submit your Personal Data to us for any other reasons.

When you browse our website, you generally do so anonymously unless a booking or contact form has been submitted by you.

If you provide us with any Personal Data relating to a third party (e.g. information of your employees, partners and/or associates), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the Products and Services you have requested.

### **Purposes for the Collection, Use and Disclosure of Personal Data**

Advantage Pilates Singapore Pte. Ltd. collects, may use and disclose your Personal Data for the following purposes:

1. Responding to your queries and requests;
2. Managing the administrative and business operations of Advantage Pilates Singapore Pte. Ltd. and complying with internal policies and procedures;
3. Facilitating business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
4. Matching any Personal Data held which relates to you for any of the purposes listed herein;
  - a. resolving complaints and handling requests and enquiries;
  - b. preventing, detecting and investigating crime and analysing and managing commercial risks;
  - c. monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
  - d. organising promotional events;
  - e. legal purposes (including but not limited to obtaining legal advice and dispute resolution); conducting investigations relating to disputes, billing or fraud; meeting or complying with any applicable rules, laws, regulations, and codes of practice or guidelines issued by any legal or regulatory bodies which are binding on Advantage Pilates Singapore Pte. Ltd. (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and

f. purposes which are reasonably related to the above-mentioned.

Where permitted under the Act:

1. Advantage Pilates Singapore Pte. Ltd. may also collect, use and disclose your Personal Data for the following “Additional Purposes”:
  - a. analytics and tracking,
  - b. conducting market research and surveys to enable us to understand and determine customer location, preferences and demographics to develop special offers and marketing programmes in relation to Advantage Pilates Singapore Pte. Ltd. Products and Services, and to improve our service delivery and your customer experience at our touchpoints;
  - c. providing additional Products and Services and benefits to you, including promotions, loyalty and reward programmes from Advantage Pilates Singapore Pte. Ltd. matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of Products and Services by Advantage Pilates Singapore Pte. Ltd.
    - Leads generation and management for marketing Advantage Pilates Singapore Pte. Ltd. and Services;
    - Administering contests, competitions and marketing campaigns, and personalising your experience at Advantage Pilates Singapore Pte. Ltd. touchpoints;
    - Communicating to you, advertisements involving details of our Products and Services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you (including but not limited to upselling, cross selling and online marketing);
    - Organising promotional events and corporate social responsibility projects; and purposes which are reasonably related to the above-mentioned.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed, for Advantage Pilates Singapore Pte. Ltd. Additional Purposes, to the vendors or other third party service providers in connection with promotions and services offered by Advantage Pilates Singapore Pte. Ltd.

2. Advantage Pilates Singapore Pte. Ltd. may also collect, use and disclose your Personal Data for the following “Preferred Partners Additional Purposes”:
  - a. conducting market research and surveys to enable us to understand and determine customer location, preferences and demographics to develop special offers and marketing programmes with our preferred partners;
  - b. matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services (including promotions, loyalty and reward programmes) by our preferred partners;
  - c. leads generation and management for marketing the products and services offered by our preferred partners;
  - d. administering contests, competitions and marketing campaigns in connection with the products and services offered by our preferred partners;
  - e. communicating to you, advertisements involving details of the products, services, special offers and rewards offered by our preferred partners, either to our customers generally, (including but not limited to upselling, cross selling and online marketing); and purposes which are reasonably related to the aforesaid.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed, for Preferred Partners' Additional Purposes, to the vendors or other third party service providers in connection with promotions and services offered by Advantage Pilates Singapore Pte. Ltd. preferred partners.

If you have provided your Singapore telephone numbers Advantage Pilates Singapore Pte. Ltd. may contact you using such Singapore telephone numbers (including via voice calls, SMS, fax or other means) with information about our Products and Services or those products and services offered by our preferred partners (including discounts, flash sales and special offers).

In relation to particular Products and Services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

When you subscribe to Advantage Pilates Singapore Pte. Ltd. mailing list and/or become Advantage Pilates Singapore Pte. Ltd. client, we may send you promotional/marketing material.

Should you wish to withdraw your consent for us to send you sales, marketing or promotional information via a specific mode, please inform us as follows:

1. to withdraw consent from receiving SMS promotions: please unsubscribe by following the steps provided in the promotional SMS;
2. to withdraw consent from promotional emails: please reply "WITHDRAW CONSENT" in the subject header of the promotional emails;
3. to withdraw consent from receiving promotional material with your order package: please email customer service, with the words "WITHDRAW CONSENT" in the subject line, at the address provided below.

Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to thirty (30) days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials through a specific mode, we may still contact you for other purposes in relation to the Products and Services that you hold or have subscribed to with Advantage Pilates Singapore Pte. Ltd.

### **Disclosure of Personal Data**

Advantage Pilates Singapore Pte. Ltd. will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following:

1. Advantage Pilates Singapore Pte. Ltd. related corporations and employees to provide content, Products and Services to you, address your questions and requests in relation to your customer accounts, subscription and billing or order arrangements with us as well as our Products and Services, to activate, deactivate, install, maintain and operate our systems and/or services;
2. Companies providing services relating to insurance and consultancy to Advantage Pilates Singapore Pte. Ltd.;
3. Agents, contractors or third party service providers who provide operational services to Advantage Pilates Singapore Pte. Ltd., such as courier services, telecommunications,

information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security or other services to Advantage Pilates Singapore Pte. Ltd.;

4. Vendors or third party service providers in connection with marketing promotions and services offered by Advantage Pilates Singapore Pte. Ltd. or its preferred partners;
5. Commercial shops and retailers in relation to providing rewards and benefits;
6. any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
7. our professional advisers such as auditors and lawyers;
8. relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
9. Any other party to whom you authorise us to disclose your Personal Data to.

### **Governing Law**

This Personal Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.