



SPA ESPRIT GROUP CUSTOMER PRIVACY POLICY

This is the customer privacy policy (“Privacy Policy”) of Spa Esprit Group Pte Ltd (200707818N), and its respective subsidiaries, related companies and jointly controlled entities (hereinafter collectively referred to as “Spa Esprit Group”) discloses how “Spa Esprit Group”, “us” or “we” collect, store and handle the Personal Data (as defined below) of its customers at Spa Esprit Group and visitors to any of the websites owned and operated by Spa Esprit Group.

We may update this privacy policy from time to time by publishing the amended version on our websites. This privacy policy applies to personal information we hold about individuals. We will only use your personal information in accordance with Personal Data Protection Act 2012 and all other current data protection law in Singapore and this Privacy Policy.

Please read the following Privacy Policy to understand how Spa Esprit Group uses the Personal Data we may collect from you.

By providing your Personal Data to us, you are voluntarily consenting to this Privacy Policy and the collection, use, access, transfer, storage and processing of your personal information as described in this Policy.

OUR WEBSITE

We are committed to keep our website secure. However, we ask you to recognise that information provided by you to us through our website or when you ask us to send your Personal Data via email or any other electronic means of communication may not be secure. We cannot be responsible for any loss or unauthorised interception of information transmitted via the internet which is beyond our control.

User-supplied information through registration, surveys, polls or other similar vehicles found in our website are utilised to improve the content of our website and overall customer experience. It is not shared with other organisations for commercial purposes unless specifically stated.

Our website may contain links to other websites outside of Spa Esprit Group. Please note that our Privacy Policy only applies to our website and we are not responsible for the security, privacy policy or manner in which how other websites collect your Personal Data.

OUR COMMITMENT TO PROTECT YOUR PRIVACY

At Spa Esprit Group, the confidentiality and importance of your Personal Data are our utmost concern; we are therefore committed in protecting your Personal Data privacy with care and in accordance with the statutory provisions. To ensure that you can make informed decisions and feel confident about supplying your Personal Data to us when using our website, mobile and other services, we provide this notice outlining our practices and the choices you have concerning how your Personal Data is being collected and used by us.

THE PERSONAL DATA WE COLLECT

We request information from you in several areas of our website, mobile services and other



channels including in-store, which may be used to personally identify you (“Personal Data”). Personal Data that we receive and process will vary, depending on the types of products and services requested by you and may include but not limited to the followings:

1. Your personal information such as your name, gender, date of birth, passport or other personally identifiable number and information about your registered status with any of our subsidiaries, associated companies and/or business associates;
2. Your contact information such as your telephone numbers, mailing addresses, email addresses, and fax numbers;
3. Your credit or debit card information and billing information, including name of cardholder, card number, billing address and expiry date;
4. Your business information such as company name, business title and associated contact information;
5. Your responses to market surveys and contests conducted by us or on our behalf.
6. Your Personal Data provided by governmental agencies, regulatory and statutory authorities,
7. Your Personal Data provided by you such as comments, queries or messages that you may submit to Spa Esprit Group in whatever manner,
8. Other data from publically available sources.

We acknowledge that the provision of your personal data is voluntary. However, should you decide not to provide us with your Personal Data (particularly relating to your personal information, contact information and past medical history) or should you provide insufficient or inaccurate information or decline to provide obligatory information requested by us, we may not be able to process your requirements and deliver or provide you the products or services you request whether partially or in full.

PURPOSE FOR WHICH THE PERSONAL DATA ARE COLLECTED AND USED

We may use the Personal Data you provided for one or more of the following purposes:

1. For your use of the online services available at any of our websites and/or through other telecommunication channels;
2. For the supply of any products and/or services which we may offer to you or you may require from us from time to time including text message (SMS) alerts;
3. For marketing, promotional and customer relationship management purposes, such as sending you updates on latest offers and promotions in connection with our products and services and conducting market research;
4. For identification and verification purposes in connection with any of the services or products that may be supplied to you;
5. To contact you regarding your enquiries;
6. To administer contests and sweepstakes conducted by us or on our behalf;
7. To disclose to a third party to comply with any law, legal requirements, orders, directions or requests from any court, authority or government body of any jurisdiction, which may be within or outside of Singapore;
8. To facilitate the payment for products and services provided by us or our subsidiaries, associated companies and/or business associates including verification of credit card details with third parties and using the Personal Data you provide to conduct matching procedures against databases of known fraudulent transactions (maintained by us or third parties).
9. To improve our security, including in relation to the processing of payment by credit



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card to guard against the risk of fraud including carrying out matching procedures against databases of known fraudulent transactions (maintained by us or third parties).

We may from time to time use aggregate non-identifying information about our customers to better design our website and/or to improve our services and products. This means we may provide this information to third parties. However, this information will never identify any single user in particular.

Except as provided below, we will not knowingly or intentionally use or share the Personal Data you provide to use in ways unrelated to the aforementioned purposes without your prior consent.

HOW TO ACCESS OR CORRECT YOUR PERSONAL DATA

Subjected to the exception provided under Singapore law, you can obtain information about your Personal Data stored by Spa Esprit Group and, may request access to any Personal Data stored about you and request for correction, updating, deletion or disabling of the your Personal Data at any time. If you wish to obtain a copy of any of your Personal Data, or if you believe that the Personal Data relating to you which we collect and maintain is inaccurate, incomplete or ceased to be true, or if you believe that the Personal Data held by us was used beyond the scope of the purpose of use disclosed above or was acquired by fraudulent or unlawful means or provided to a third party without your prior consent, please write to us at the address below.

Any queries, complaints, objections or request for access or correction to, or deletion of Personal Data or for information regarding policies and practices and kinds of Personal Data held by us, or should you wish to limit the processing of your Personal Data, or to withdraw any voluntary consent provided by you, must be in writing and sent to us via postal mail at the following address:

Customer Care
Spa Esprit Group Pte Ltd
60 Jalan Penjara
Singapore 149375

We reserve a right to impose a reasonable fee as permitted under law for the processing of any data access request. We have the right to refuse your request to access and/or make any correction to your Personal Data for reasons permitted under law.

USE OF COOKIES ON SPA ESPRIT GROUP SITES

A cookie is an alphanumeric string of identifier that websites of the Spa Esprit Group use to transfer to the cookie file of the browser on your computer's hard disk. With the use of cookies, we can better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future.

Two types of cookies are used on the Sites:



Session Cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the site.

Persistent Cookies, which remain in the cookies file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

LINKS TO OTHER SITES

This website contains links to other sites that are operated by third party companies with different contents, securities and privacy practices. You should remain alert when you leave our site and read the privacy statements of other websites. We have no control over Personal Data that you submit to or receive from these third parties and are not responsible for any Personal Data which you may submit outside of our website.

OUR COMMITMENT TO PERSONAL DATA SECURITY

For example, we use Secure Socket Layer (SSL) protocol – an industry standard for encryption over the Internet – to protect in transmission the Personal Data we collect online. When you type in sensitive information such as credit card details, it will be automatically converted into codes before being securely dispatched over the Internet. All electronic Personal Data that we maintain is securely stored and further protected through our use of appropriate access controls. When disposing of Personal Data, paper documents containing Personal Data are securely destroyed, and electronic files storing Personal Data are permanently deleted.

As stated above, in some instances we may entrust Personal Data to third party service providers (including service providers outside of your jurisdiction), binding them to protect the security of Personal Data and only to use it for the purposes we specify.

DISCLOSURE AND TRANSFER OF PERSONAL DATA

Spa Esprit Group Pte Ltd (Co. Registration 200707818N), together with its subsidiaries and related companies (“Spa Esprit Group”), is a global beauty, food and beverage company with operations, offices, affiliates and business partners located worldwide. As such, the Personal Data you submit to us in one country may be transferred, used, processed, stored and accessed worldwide in one or more additional countries, as described in this Privacy Policy.

In addition, we may disclose and transfer Personal Data to and jointly use Personal Data with (whether within or outside of your jurisdiction) our subsidiaries, associated companies, business associates, service providers, and other persons who we consider appropriate, in connection with the services and products provided to or requested by you. We may disclose this information to facilitate communication of news and information about such services and products and otherwise for the purposes mentioned above, under “*Purpose for which the Personal Data are Collected and Used.*”

The entities with whom we may share your Personal Data include but are not limited to:

1. Spa Esprit Group and its subsidiaries and related companies;
2. Any agent, contractor or third party service provider who provides administrative, marketing and research, distribution, data processing, telemarketing,



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- telecommunications, computer, payment or other services to Spa Esprit Group and its subsidiaries in connection with the operation of its business;
3. Other business associates such as loyalty program operators and other companies involved in providing customer service or fulfilling customer requests;
 4. Credit reference agencies;
 5. Credit, debit and /or charge card companies and/or banks;
 6. Government or non-government authorities, agencies and/or regulators;
 7. Medical professionals, insurers and clinics/hospitals.

Where permitted by applicable local law, we may also disclose your Personal Data to third parties: (i) when required by law, by court order, or in response to a search warrant or other legally valid inquiry; (ii) to an investigative body; (iii) to enforce our agreements with you; (iv) when requested by other government or law enforcement authorities; (v) with your express consent, or, (vi) pursuant to our good faith belief that disclosure is required by law or otherwise necessary to the establishment of legal claims or defenses, to obtain legal advice, to exercise and defend our legal rights, to protect our rights or property and those of our subsidiaries or associated companies, or to protect the life, body or property of an individual. This also applies when we have reason to believe that disclosing the Personal Data is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

We may also transfer any information we have about you as an asset in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Spa Esprit Group or as part of a corporate reorganization or stock sale or other change in corporate control.

Please be advised that the Personal Data that Spa Esprit Group collects or obtains may be transferred to jurisdictions that offer lesser protection of Personal Data than that provided in your jurisdiction. By submitting personal information to Spa Esprit Group or using any Spa Esprit Group or its related associates' website, you understand and consent to such transfer.

CONFIDENTIALITY

Personal Data held by us will be kept confidential in accordance with this Privacy Policy pursuant to any applicable law that may from time to time be in force.

Any questions, comments, suggestions or information other than Personal Data sent or posted to this Website, or any part of this Website by visitors will be deemed voluntarily provided to us on a non-confidential and non-proprietary basis.

CHANGES TO PRIVACY POLICY

We reserve the right to amend this Privacy Policy from time to time without prior notice. We advise that you check this Privacy Policy on a regular basis. We will post on our website any changes to this policy with the effective date of the changed policy, so that you can be informed of the way we collect and use your Personal Data any time you so choose. If at any point we decide to use the Personal Data you submitted under this current policy in a way that differs materially from the privacy policy that applied at the time of that submission, you



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will be notified and given the opportunity via the website, email or in writing to opt out or otherwise prevent such usage.

YOUR CHOICE

Occasionally, we may use your personal data (including your name and contact details) to send you marketing communications such as emails containing news, offers, promotions and joint marketing offers. However, we will first obtain your consent before doing so. Please see below on how to provide us with your consent.

We may also provide your personal data (including your name and contact details) to third parties including our marketing partners, travel service partners for the purpose of marketing their products and services to you. Again, we will only do this if you provide us with your consent.

You may indicate your consent to the above by the following ways:

1. when providing us with your personal data through our website or a form, ticking boxes indicating your consent;
2. when providing us with your personal data through the telephone, tell our customer representative that you consent; or

You may opt-out from receiving marketing communications at any time, free of charge, by:

1. following the opt-out instructions contained in the communications;
2. writing to us at the address listed above; or

Any personal data provided to or gathered by Spa Esprit Group is controlled primarily by Spa Esprit Group Pte Ltd.

RETENTION OF DATA

All Personal Data that has been collected from you will only be stored for a limited duration that is relevant to the purpose for which it was processed and for as long as required by applicable law.

This Privacy Policy is written in English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

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TERMS AND CONDITIONS

By accessing or using the Services you agree to be bound by these Terms, which govern your access to, and use of this website (the “Services”), and any information, text, graphics, or other materials uploaded, downloaded, or appearing on the Services (collectively referred to as “Content”). If you do not accept any of these terms or conditions, you must immediately discontinue your access of this website and/or use of the online service.

Use of Services

All rights, titles, and interest in and to the Services are and will remain the exclusive property of the Services and its licensors. The Services (including information regarding, or links to Spa Esprit Group Pte Ltd (200707818N), its respective subsidiaries, related companies and jointly controlled entities (collectively known as “Spa Esprit Group”), are protected by copyright, trademark, and other laws, of both the Republic of Singapore and foreign countries. Nothing in the Terms gives you a right to use the Services’ trademarks, logos, domain names, and other distinctive brand features, and you may not use the same without our express written permission. Any feedback, comments, or suggestions (“Submission”) you may provide regarding the Services is entirely voluntary and we will be free to use such Submission as we see fit and without any obligation to you. By making a Submission, you grant us a non-exclusive, royalty-free, perpetual, irrevocable, and fully sub licensable right to use, reproduce, modify, adapt, publish, translate, create derivative works from, distribute, and display such Submission throughout the world in any media. You also grant us the right to use the name you submit in connection with such Submission.

The Services are always evolving and the form and nature of the Services may change from time to time without prior notice to you. In addition, the Services (or any features within the Services) may be terminated to you or to users generally and may not be able to provide you with prior notice. We also retain the right to create limits on use at our sole discretion at any time without prior notice to you.

In order to use certain Services, you may need to register at the website, create a username and provide certain information about yourself as prompted by the registration form, including a valid email address. We reserve the right to reclaim usernames that violate these Terms.

Disclaimer

The information and materials contained in or accessed through this website are provided on an "as is" and "as available" basis and are of a general nature which have not been verified, considered or assessed by any member of the Spa Esprit Group in relation to the making of any specific investment, business, financial or commercial decision. Such information and materials are provided for general information only and you should seek professional advice



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at all times and obtain independent verification of the information and materials contained herein before making any decision based on any such information or materials.

The Spa Esprit Group does not warrant the truth, accuracy, adequacy, completeness or reasonableness of the information and materials contained in or accessed through this website and expressly disclaims liability for any errors in, or omissions from, such information and materials. No warranty of any kind, implied, express or statutory (including but not limited to, warranties of title, merchantability, satisfactory quality, non-infringement of third-party intellectual property rights, fitness for a particular purpose and freedom from computer virus and other malicious code), is given in conjunction with such information and materials, or this website in general.

Under no circumstances shall the Spa Esprit Group be liable regardless of the form of action for any failure of performance, system, server or connection failure, error, omission, interruption, breach of security, computer virus, malicious code, corruption, delay in operation or transmission, transmission error or unavailability of access in connection with your accessing this website and/or using the online services even if the Spa Esprit Group had been advised as to the possibility.

In no event shall the Spa Esprit Group be liable to you or any other party for any damages, losses, expenses or costs whatsoever (including without limitation, any direct, indirect, special, incidental or consequential damages, loss of profits or loss opportunity) arising in connection with your use of this website, or reliance on any information, materials or online services provided at this website, regardless of the form of action and even if the Spa Esprit Group had been advised as to the possibility of such damages.

Hyperlinks

For your convenience, the Spa Esprit Group may include hyperlinks to websites on the Internet that are owned or operated by third parties. Such linked websites are not under the control of the Spa Esprit Group and the Spa Esprit Group cannot accept responsibility for the contents of or the consequences of accessing any linked website or any link contained in a linked website. Furthermore, the hyperlinks provided in this website shall not be considered or construed as an endorsement or verification of such linked websites or the contents therein by the Spa Esprit Group. You agree that your access to and/or use of such linked websites is entirely at your own risk and subject to the terms and conditions of access and/or use contained therein.

Indemnity

You hereby agree to indemnify and save the Spa Esprit Group harmless against all damages, losses, expenses and costs (including legal costs) suffered or incurred by the Spa Esprit Group in connection with or arising from (1) your access of this website and/or use of the online services, or (2) any other party's access of this website and/or use of the online services using your user id and/or login password, or (3) your breach of any of these Terms



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and Conditions of Access, or (4) any other party's breach of any of these Terms and Conditions of Access where such party was able to access this website and/or use the online services by using your user id and/or login password.

Privacy Policy

Any personal information that you provide to the website (Personal Data) is subject to our Privacy Policy which governs our collection and use of your personal information. You understand that through your use of the Services you consent to the collection and use (as set forth in the Privacy Policy) of this information, including the transfer of this information to other countries for storage, processing, and use by the website. As part of providing you the Services, we may need to provide you with certain communications, such as service announcements and administrative messages. These communications are considered part of the Services and your account, which you may not be able to opt-out from receiving.

Anti-Spam Policy

The website will only send email communication to users who have subscribed to the email list, and will not send Spam emails. Any subscribers can unsubscribe from the email list and stop receiving emails from the website.

Any queries, complaints, objections or request for access or correction to, or deletion of Personal Data or for information regarding policies and practices and kinds of Personal Data held by us, or should you wish to limit the processing of your Personal Data, or to withdraw any voluntary consent provided by you, must be in writing and sent to us via postal mail at the following address:

Customer Care
Spa Esprit Group Pte Ltd
60 Jalan Penjara
Singapore 149375

Governing Law

Nothing herein shall be construed as a representation by the Spa Esprit Group that the information and materials contained in or accessed through this website is appropriate or available for use in geographic areas or jurisdictions other than Singapore. By accessing this website and/or using the online services, you agree that such access and/or use, as well as these Terms and Conditions of Access shall be governed by, and construed in accordance with, the laws of Singapore and you agree to submit to the non-exclusive jurisdiction of the Singapore courts.

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