

Privacy Policy

Last Revised: 1 November 2023

PRIVACY POLICY

This privacy policy ("**Privacy Policy**") governs the way Tilkoblet Pte. Ltd. ("**Tilkoblet**") collects, uses, discloses, and processes your Personal Data.

By interacting with us, submitting information to us, or signing up for any products and/or services offered by us ("**Services**"), you agree and consent to Tilkoblet, its affiliates, and their representatives, agents and/or service providers ("**Coinhako Group**", "**us**", "**we**", "**our**") collecting, using, disclosing, processing, and sharing your Personal Data to amongst ourselves to the extent necessary for the provision of Services or otherwise consented to by you, and disclosing such Personal Data to our authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are cumulative and additional to any rights which we may have at law to collect, use, disclose and/or process your Personal Data. This Privacy Policy does not affect any rights which we may have at law in connection with the collection, use, disclosure and/or processing of your Personal Data.

We may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with our future developments 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 this Privacy Policy as updated from time to time on our website or app. Please check the website or app regularly for updated information on the handling of your Personal Data. Unless otherwise defined herein or where the context requires otherwise, capitalised terms used in this Privacy Policy shall have the same meaning given to them in the Terms of Use.

1. **PERSONAL DATA**

1. As used in this Privacy Policy:

1. "**Customer**" means an individual who (i) interacts with us, (ii) submits any information to us; (iii) has contacted us through any means to find out more about any Services, or (iv) may or has, entered into a contract with us for the supply or any Services.
2. "**Client**" means any individual or corporate information who "**Customer**" has stored to use any Services, or entered into a contract with "**Customer**" for the supply or any Services from "**Customer**".
3. "**Data Protection Laws**" means any applicable law relating to the protection, privacy and security, collection, use, disclosure and/or processing of sensitive or other personally identifiable information, including the Singapore Personal Data Protection Act 2012.
4. "**Personal Data**" means all data that falls within the definition of personal or corporate information, personal data, personally identifiable information, or similar language under Data Protection Laws.

2. Depending on the nature of your interaction with us, some examples of Personal Data which we may collect from you include:

1. Name;
 2. national identification numbers (including NRIC, FIN, work permit, passport, and birth certificate numbers);
 3. residential address;
 4. email address;
 5. telephone number;
 6. date of birth;
 7. employment information and financial information;
 8. information about your use of our website and/or Services, such as the browser name, the type of computer and technical information about your means of connection to our website, such as the operating system and the Internet service providers utilised and other similar information.
3. For the avoidance of doubt, if Data Protection Laws permit us to collect, use, disclose and/or process your Personal Data without your consent, such legal basis for collecting, using, disclosing and/or processing your Personal Data shall continue to be effective.

2. COLLECTION OF PERSONAL DATA

1. Generally, we collect your Personal Data in the following ways:
 1. when you visit our website;
 2. when you register for and/or use any of our Services or in connection with any other activities, features, resources, surveys or contests on our websites;
 3. when you submit forms (online or otherwise) relating to any Services or submit any online queries;
 4. when you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails;
 5. when you request that we contact you or request that you be included in an email or other mailing list;
 6. when you respond to our promotions, initiatives or to any request for additional Personal Data;
 7. when we receive references from business partners and third parties, for example, where you have been referred by them;
 8. when your images or conversations are captured by us via CCTV cameras while you are within our property and/or premises, or via photographs or videos taken by us or our representatives when you attend our events;
 9. when you are contacted by, and respond to, our marketing representatives and customer service officers;
 10. when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our Services or job applications, for example, from our affiliates, business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities; and/or
 11. when you submit your Personal Data to us for any other reason.
2. When you browse our website without logging in, you generally do so anonymously but please see paragraph 8 below for information on cookies and other technologies which we may have implemented

on our website. We do not, at our website, automatically collect Personal Data unless you provide such information to us or if you are logged in.

3. If you provide us with any Personal Data relating to a third party, by submitting such information to us, you represent and warrant that the collection, use, disclosure and/or processing of that Personal Data by us for the purposes set out below, is lawful, and you have obtained the consent of the third party to provide us with their Personal Data.

3. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

1. In general, we collect, use, disclose and/or process your Personal Data for the following purposes:
 1. providing the Services to you and performing our obligations in the course of or in connection with our provision of the Services;
 2. verifying your identity;
 3. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 4. administering and/or managing your relationship with us and your use of the Services;
 5. processing payment or credit transactions;
 6. organising, facilitating, and administering surveys, promotional events, contests, competitions and/or other features;
 7. complying with any contractual terms and conditions to which we are bound by, 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;
 8. notifying you of any information or updates pertaining to your orders and/or any service issues and unusual account actions;
 9. commencing, responding to or acting in connection with any claims, actions or proceedings (including drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution);
 10. communicating with you changes and developments to our policies, terms and conditions and other administrative information;
 11. preventing, detecting and investigating crime (including fraud, money-laundering and terrorism financing) and managing the safety and security of our premises and Services (including carrying out CCTV surveillance and conducting security clearances);
 12. performing credit analysis;
 13. conducting audits, reviews and analysis of our internal processes, action planning and managing commercial risks;
 14. improving or enhancing any Services, or developing new products and/or services to be provided by us;
 15. improving or enhancing the methods or processes, or developing new methods or processes, for the operations of us;
 16. learning and understanding the behaviour and preferences of you or another individual in relation to the Services;
 17. identifying any other Services provided by us that may be suitable for you or another individual, or personalising or customising any such Services for you or another individual;

18. any other purposes for which you have provided the information; and/or
 19. for purposes which are reasonably related to the aforesaid.
2. In addition, we collect, use, disclose and/or process your Personal Data for the following purposes if you submit an application to us as a candidate for an employment or representative position:
 1. conducting interviews;
 2. processing your application which includes pre-recruitment checks involving your qualifications and facilitating interviews;
 3. providing or obtaining employee references and for background screening;
 4. assessing your suitability for the position applied for;
 5. processing staff referrals;
 6. entering into an employment relationship with you or appointing you to any office;
 7. managing or terminating the employment relationship with or appointing you; and/or
 8. for purposes which are reasonably related to the aforesaid.
 3. Furthermore, and without prejudice to the generality of the foregoing, and where permitted under Data Protection Laws, we may also collect, use, disclose and/or process your Personal Data for any of the following purposes ("**Additional Purposes**"):
 1. providing or marketing the Services and benefits to you, including promotions, loyalty and reward programmes;
 2. matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the customisation, provision or offering of the Services, marketing or promotions, whether by us or other third parties;
 3. administering contests and competitions, and personalising your experience at our touchpoints;
 4. sending you details of the Services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you; and/or
 5. conducting research, analysis, and development activities (including data analytics, surveys, product and service development and/or profiling), understanding and analysing customer behaviour, location, preferences and demographics for us to offer you the Services as well as special offers and marketing programmes which may be relevant to your preferences and profile.
 4. If you have provided us with your telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your telephone number(s), then from time to time, we may contact you using such telephone number(s) (including via voice calls, text, fax, or other means) with information about the Services.
 5. In relation to particular Services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use, disclose and/or process your Personal Data. If so, we will collect, use, disclose and/or process your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.
 6. 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 a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

4. **DISCLOSURE OF PERSONAL DATA**

1. Subject to the provisions of any applicable law, you hereby agree, acknowledge and consent that your Personal Data may be disclosed for any of the purposes listed above in this Privacy Policy (as applicable) to the following entities or parties, regardless of whether they are located overseas or otherwise:
 1. vendors, third party service providers, agents and other organisations we have engaged to perform any of the functions in connection with any of the purposes listed above in this Privacy Policy (which may include dtt.sg, tilko.sg);
 2. relevant government ministries, 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;
 3. amongst our subsidiaries, affiliates and related corporations (including their respective staff);
 4. contractors, agents, service providers and other third parties we use to support our business. These include but are not limited to those which provide administrative or other services to us such as mailing houses, telecommunication companies, information technology companies and data centres;
 5. our corporate clients;
 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);
 7. external banks, credit card companies, other financial institutions and their respective service providers;
 8. our professional advisers such as consultants, auditors, and lawyers; and/or
 9. any other party to whom you authorise us to disclose your Personal Data to.
2. We may also share information about you in aggregate or anonymised form, for example, generic aggregated demographic information regarding visitors and users, with the above mentioned entities or parties (e.g., our business partners, affiliates, and advertisers).

5. **WITHDRAWING YOUR CONSENT**

1. The consent that you provide for the collection, use, disclosure and/or processing 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, disclosing and/or processing your Personal Data for any or all of the purposes listed above by submitting your request in writing or via email to us using the contact details set out at Paragraph 13 below.
2. 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 will seek to process your request within ten (10) business days of receiving it.
3. Whilst we respect your decision to withdraw your consent, please note that if you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide its Services to you, or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with us, and your being in breach of your contractual obligations or undertakings. Our legal rights and remedies in such events are expressly reserved.

4. Please also note that withdrawing consent does not affect our right to continue to collect, use, disclose and/or process Personal Data where such collection, use, disclosure and/or processing without consent is permitted or required under applicable laws.

6. ACCESS TO AND CORRECTION OF PERSONAL DATA

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, 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 us using the contact details set out at Paragraph 13 below.
2. 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.
3. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) business days after receiving your request, we will inform you in writing within thirty (30) business 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 Data Protection Laws).

7. ACCURACY OF PERSONAL DATA

1. We generally rely on Personal Data provided by you (or your authorised representative). To ensure that your Personal Data is current, complete and accurate, please update us if there are changes to your Personal Data in writing or via email to us using the contact details set out at Paragraph 13 below. For certain categories of Personal Data, you may also update your Personal Data directly via the website or our Services.

8. USE OF COOKIES

1. When you visit or interact with our websites and/or Services, we or our authorised service providers may use cookies, web storage, and other similar technologies for collecting and storing information to enhance your user experience.
2. The information collected by us or our authorised service providers may recognise a visitor as a unique visitor and may collect information such as how a visitor arrives at our websites, a visitor's IP address, what kind of web browser a visitor is on, what operating system a visitor is using, the domain name of a visitor's internet service providers, data on the number of visitors visiting our websites and a visitor's clickstream information and time stamp (for example, which pages or articles they have visited and the length of visit).
3. The use of cookies, web storage and similar technologies by us on our website has different functions. They are either necessary for the functioning of the Services, help us improve our performance, or serve to provide you with extra functionalities. They may also be used to deliver content that is more relevant to you and your interests, or to target advertising to you on or off our sites.
4. **Cookies.** Small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. Cookies allow a website to recognise a particular device or browser. There are several types of cookies:
 1. session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session;

2. persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites;
 3. first-party cookies are set by the site you are visiting; and
 4. third-party cookies are set by a third-party site separate from the site you are visiting.
5. **Disabling Cookies.** Cookies can be disabled or removed by tools that are available in most commercial browsers. The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options. You can also delete cookies already on your hard drive at any time.
6. **Web Storage.** Small text data may be placed in most commercial browsers. Web Storage typically works in conjunction with cookies to profile each unique user and user behaviour.
7. **Similar Technologies.** Technologies that store information in your browser or device utilising local shared objects or local storage, such as flash cookies, HTML 5 cookies, and other web application software methods. These technologies can operate across all of your browsers.
8. We may use the terms "cookies" or "similar technologies" interchangeably in our policies to refer to all technologies that we may use to collect or store information in your browser or device or that collect information or assist in identifying you as a unique user in the manner described above.
9. Certain website features and Services are available only through the use of these technologies. You are always free to block, delete, or disable these technologies if your browser so permits. However, if you decline cookies or other similar technologies, you may not be able to take advantage of such website features or Services. For more information on how you can block, delete, or disable these technologies, please review your browser settings.

9. PROTECTION OF PERSONAL DATA

1. We are committed to the security of your Personal Data and implement appropriate data collection, storage and processing practices and security measures to protect your Personal Data. 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.

10. RETENTION OF PERSONAL DATA

1. 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.
2. 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.

11. TRANSFERS OF PERSONAL DATA OVERSEAS

1. When we transfer your Personal Data to countries outside of Singapore or otherwise, we will take steps to ensure such transfer is in accordance with Data Protection Laws, including ensuring that organisations provide a standard of protection to Personal Data so transferred that is comparable to the Data Protection Laws. You hereby consent to such transfers of your Personal Data outside Singapore or otherwise.

12. THIRD PARTY SITES

1. The website or Services may from time to time contain links to third-party websites, services or other content that are not owned or controlled by us ("**Third-Party Sites**"). You acknowledge that Third-Party

Sites usually have their own terms and conditions (including privacy policies) which we do not control and will govern your rights and obligations with respect to the access and/or use of those websites, services or other content contained therein. It is your responsibility to read all such terms and conditions of any Third-Party Sites that you visit.

13. CONTACTING US

1. If you: (a) have any questions or feedback relating to your Personal Data or about this Privacy Policy; (b) would like to withdraw your consent to any use of your Personal Data as set out in this Privacy Policy; or (c) would like to obtain access and make correction to your Personal Data records, please contact us as follows:

Email: hello@tilko.sg

Attention: Data Protection Officer

2. Please note that if your Personal Data has been provided to us by a third party, you should contact that organisation or individual to make such queries, complaints, and access and correction requests to us on your behalf.

14. GOVERNING LAW

1. This Privacy Policy shall be governed in all respects by the laws of Singapore.

15. EFFECT OF NOTICE AND CHANGES TO NOTICE

1. This Privacy Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use, disclosure and/or processing of your Personal Data by us.
2. We shall have the discretion to update this Privacy Policy at any time without prior notice. You may determine if any such revision has taken place by referring to the date on which this Privacy Policy was last updated. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications. Your continued interaction with us or use of the Services shall constitute your acknowledgement and acceptance of such changes.