



PRIVACY POLICY

1. Personal information we collect and hold

The kinds of personal information that we collect and hold varies depending on the particular business context by which it was procured, however in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth), we endeavor to ensure that we only collect and hold personal information that is necessary for the purposes of our business activities.

Typically, the personal information we collect and hold will include, inter alia, customer names, email addresses and telephone numbers.

2. How we collect and hold personal information

The ways in which we collect and hold personal information vary depending on the particular business context by which it was procured. For example, we may procure your name and email address if you contact us by email, and in that email to us you may have provided us with your telephone number. In the context of our social hotspot® services, we require you to enter your email address when you accept the social hotspot® services' Terms of Use and click "CONNECT".

We also collect information about customer behavior and trends, such as demand for services, the frequency of visits, the number of customers, peak visiting days and times, visit duration, whether a customer is a tourist or a resident, customer sentiments on service and products, and so on.

3. Why we collect, hold, use and disclose personal information

We collect, use, and/or disclose the personal information including customer behavior and trends referred to at 2 to enable us, our clients, our agents, business partners, and/or service providers to gain an insight into the customer behavior and trends for the purpose of, inter alia, assessing the efficacy of service, quality of products, target audience, peak demand for service and so on.

4. Your right to anonymity, your rights to access and seek correction of personal information

You have a right to deal with us anonymously or by using a pseudonym, by for example making a general enquiry using an email address which does not display your name. However, if you do wish to deal with us anonymously or by using a pseudonym, this may limit our ability to assist with your enquiries.

In accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth), you have a right to access and/or correct any personal information we may hold about you. There may be a cost to you if your request requires a detailed search of our records or is complex, however there will be no cost to you for the lodging the request itself. If you wish to deal with us anonymously or by using a pseudonym, we will be unable to assist in giving you access to any personal information we may hold about you as we will not be able to properly identify you.

If you would like to correct any personal information we may hold about you because you believe there is an error, you have the right to ask us to correct this information.



Please note that we are not required to give you access to the personal information to the extent that:

- (a) We reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- (b) Giving you access would have an unreasonable impact on the privacy of other individuals; or
- (c) Your request for access is frivolous or vexatious; or
- (d) The information relates to existing or anticipated legal proceedings between us and you, and would not be accessible by the process of discovery in those proceedings; or
- (e) Giving access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations; or
- (f) Giving you access would be unlawful; or
- (g) Denying you access is required or authorised by or under an Australian law or a court/tribunal order; or
- (h) Both of the following apply:
 - (i) we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in;
 - (ii) giving you access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- (i) giving you access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (j) giving you access would reveal evaluative information generated within Loc8te in connection with a commercially sensitive decision-making process.

Any request for access or correction must be directed to dpo@loc8te.com.sg. In accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth), we will respond to your request within a reasonable time after the request is made.

5. Complaints processes

If you wish to make a complaint about the collection, use or disclosure of your personal information, you may direct such complaint to dpo@loc8te.com.sg. If you wish to deal with us anonymously or by



using a pseudonym, we may be unable to investigate, assist with or respond to your complaint, as we will not be able to properly identify you.

If you are dissatisfied with the response you receive, you may make your complaint to the Office of the Australian Information Commissioner. You must do so in writing. If you are able, you should make your complaint through the available online Privacy Complaint form, which may be found at www.oaic.gov.au/privacy/making-a-privacy-complaint.

If you wish to withdraw your consent to our collection, use or disclosure of your personal information, you may do so by directing your request to dpo@loc8te.com.sg. If you wish to deal with us anonymously or by using a pseudonym, we may be unable to confirm the withdrawal of your consent as we will not be able to properly identify you.

6. Disclosure of personal information to overseas recipients

We may, from time to time, disclose personal information to an overseas recipient. If we do so, we take reasonable steps in the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles (excluding Principle 1) set out in the *Privacy Act 1988* (Cth).

7. Definitions

- (a) “personal data” means data, whether true or not, about an individual who can be identified from that data which includes an individual’s name, email address, telephone number;
- (b) “personal information” has the same meaning given to it by the *Privacy Act 1988* (Cth);
- (c) “overseas recipient” has the same meaning given to it by the *Privacy Act 1988* (Cth).