

# WADZPAY PERSONAL DATA POLICY

3 May 2023

## PURPOSE

This document sets out the WadzPay.com policy on personal data and its use (“Notice”), and sets out the basis which the whole WadzPay group of entities in any geographical location (“we”, “us”, “our” or “WadzPay”) may collect, use, disclose or otherwise process personal data of our Customers in accordance with the Personal Data Protection Act (“PDPA”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our specified legal purposes.

WadzPay collects information directly from customers, employees and third party contractors by means such as contact forms, application forms, questionnaires and email communications.

Personal information and data provided to WadzPay will always be handled in accordance with this policy, regardless of who provides it.

## PERSONAL DATA

1. WadzPay will collect information only if the information is necessary for one or more of its functions or activities and with consent. WadzPay collects information only by lawful and fair means and not in an unreasonably intrusive way.

“Customer” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and “personal data” means data, whether true or not, about a customer 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.

Other terms used in this document shall have the meanings given to them in the Personal Data Protection Act of Singapore (PDPA).

2. Depending on the nature of your interaction with us, some examples of “personal data” which we may collect from you and utilise include:

- Your name and identification information such as your national identification or passport number, address, email address, telephone numbers, fax numbers and date of birth, nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information and financial information such as credit card numbers, debit card numbers or bank account information
- Pre-engagement information in KYC documents
- Contact information for Next-of-Kin (NOK)
- Personally Identifiable information (PII) such as face capture, fingerprint, handwriting etc.
- Curriculum vitae, academic records/transcripts, medical/health information, prior employment details and written character references/letters

## COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

3. Where your personal data is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or where the collection and use of personal data without consent is permitted or required by the PDPA or other laws, we will store and use them only for the specified legal purposes. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

4. We may collect and use your personal data for any or all of the following purposes:

(a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you; (b) verifying your identity; (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you; (d) managing your relationship with us; (e) processing payment or credit transactions; (f) sending your marketing information about our goods or services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes and other promotions; (g) complying with any 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; (h) any other purposes for which you have provided the information; (i) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or

abroad, for the aforementioned purposes; and (j) any other incidental business purposes related to or in connection with the above.

5. We may disclose your personal data: (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you; or (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions listed, for us.

6. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) 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 against you).

## WITHDRAWING YOUR CONSENT

7. The consent that you provide for the collection, use and disclosure 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 using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer listed on the [www.wadipay.com](http://www.wadipay.com) website.

8. 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 shall seek to process your request within ten (10) business days of receiving it.

9. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be able to continue providing our goods or services to you if we do not have your consent to use the same and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described above.

10. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

## ACCESS TO AND CORRECTION OF PERSONAL DATA

11. 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 our Data Protection Officer listed in the WadzPay website.

12. We will respond to your request within 30 days or as soon as is reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) 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 the PDPA).

## PROTECTION OF PERSONAL DATA

13. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

14. 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 entirely guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

## ACCURACY OF PERSONAL DATA

15. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via the email address provided herein.

## RETENTION OF PERSONAL DATA

16. 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.

17. We will cease to retain your personal data, or shall 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.

## TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

18. By accessing our services, you acknowledge that we generally transfer all data to countries outside of Singapore for storing and processing (either in the cloud or physically). You acknowledge that these transfers are made and consent to such transfers; regardless, we will take steps to ensure that your personal data continues to receive a standard of protection that is acceptable in accordance with all relevant applicable laws.

## COOKIES

19. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google or our other technology in the manner and for the purposes set out above.

## OTHERS

20. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, you may contact us at [legal@wadzpay.com](mailto:legal@wadzpay.com)

21. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

**Dated: 16 May 2023**